

Sustainability Appraisal (SA) of the Croydon Local Plan: Strategic Policies Partial Review

SA Report

September 2016

REVISION SCHEDULE

1	September 2016	SA Report published alongside the 'proposed submission' version of CLP 1.1: Strategic Policies Partial Review	Alex White Associate Director	Mark Fessey Principal Consultant	Steve Smith Technical Director
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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Croydon Local Plan: Strategic Policies Partial Review (henceforth 'CLP1.1'). SA is a mechanism for considering and communicating the impacts of a draft plan, and alternatives, with a view to avoiding and mitigating adverse impacts and maximising the positives. SA of Local Plans is a legal requirement.¹

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²

- 2.1.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.

- 2.1.3 More specifically, the SA Report must answer the following **three questions**:

1. What has Plan-making / SA involved **up to this point**?
 - Including with regards to consideration of 'reasonable alternatives'.
2. What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan.
3. What happens **next**?
 - What steps will be taken to finalise the plan?
 - What measures are proposed to monitor plan implementation?

2.2 This SA Report⁴

- 2.2.1 This document is the SA Report for CLP1.1, and as such each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.
- 2.2.2 Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What's the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal in parallel with the production of Local Plans; and the centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that the SA Report is published alongside the 'Proposed Submission' plan document.

² Directive 2001/42/EC

³ Regulation 12(2)

⁴ See Appendix I for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely where within this report certain regulatory reporting requirements are met.

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

3.1.1 At the current time the Croydon Local Plan comprises the adopted 'Strategic Policies' (formally the 'Core Strategy'),⁵ but the intention is for the Croydon Local Plan to comprise two parts: the Strategic Policies (CLP1) and Detailed Policies and Proposals (CLP2).⁶

3.1.2 The aim of CLP1 is to establish a spatial vision and state broadly how growth will be delivered. Croydon needs a spatial plan to rise to the challenges facing the borough over the next 20 years and beyond. There is a need for new homes, jobs and the infrastructure to support them, and the challenge for the plan is to address these issues and accommodate sustainable growth whilst respecting the context of Croydon and the 'Places' within. Whilst a version of the CLP1 was adopted in April 2013, a partial review is being undertaken at the current time. The Croydon Local Plan: Strategic Policies Partial Review is otherwise known as **CLP1.1**.

3.1.3 The primary focus of CLP1.1 is revision of Policy SP2 (Homes) to reflect the Further Alterations to the London Plan (2015) and updated evidence on the need for homes, Gypsy and Traveller pitches and affordable housing. CLP1.1 also provides an opportunity to update a small number of other policies to reflect new evidence and analysis of how Strategic Policies have operated since adoption in 2013. These policy areas include: local heritage area designations; archaeological priority zone designations; tier 2 employment location designations; community facility (in particular public houses) protection; and designation of an office retention zone for New Town within the Croydon Opportunity Area.

N.B. **CLP2** will accompany CLP1 and will essentially do two things: 1) Set out detailed planning policies that will help put the Strategic Policies into practice when determining planning applications; and 2) Allocate specific sites for development and land uses up to 2036 to meet the requirements of the Strategic Policies.

3.2 Plan objectives

3.2.1 Despite the fact that only certain policy areas covered by the adopted Strategic Policies document are being considered through CLP1.1, it is worthwhile recapping on the objectives of the Local Plan, as stated within the adopted Strategic Policies.

3.2.2 Objectives have been developed in-light of the 'We are Croydon' vision for Croydon in 2040. The vision is the work of 20,000 people imagining the borough in the future, and is used by Croydon Council's partners as the basis for preparing strategies and plans.

3.2.3 The objectives are as follows -

- A Place of Opportunity
 - Strategic Objective 1: Establish Croydon as the premier business location in South London and the Gatwick Diamond.
 - Strategic Objective 2: Foster an environment where both existing, and new, innovative, cultural and creative enterprises can prosper.
 - Strategic Objective 3: Provide a choice of housing for people at all stages of life.
 - Strategic Objective 4: Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

⁵ The adopted South London Waste Plan 2012 and Saved Unitary Development Plan policies 2013 also form part of the Local Plan.

⁶ The Detailed Policies and Proposals will supersede the Saved Unitary Development Plan policies 2013 on adoption.

- A Place to Belong
 - Strategic Objective 5: Ensure that high quality new development both integrates, respects and enhances the borough’s natural environment and built heritage.
 - Strategic Objective 6: Provide and promote well designed emergency services, community, education, health and leisure facilities to meet the aspirations and needs of a diverse community.
 - Strategic Objective 7: Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.
- A Place with a Sustainable Future
 - Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.
 - Strategic Objective 9: Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.
 - Strategic Objective 10: Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity.
 - Strategic Objective 11: Tackle flood risk by making space for water and utilising sustainable urban drainage systems.

3.3 What’s the plan not trying to achieve?

- 3.3.1 It is worth reiterating that only certain policy areas are being considered through CLP1.1. More generally, the objective of CLP 1.1 is to set high level strategic policy only, recognising that detail can and will be added through CLP2 (including through the allocation of sites for development, although even this should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological 'framework' for) SA. Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in within the SA Scoping Report available at:

<https://www.croydon.gov.uk/planningandregeneration/framework/localplan/sustainabilityapp>

Consultation on the scope

4.1.2 The SEA Regulations require that *“When deciding on the scope and level of detail of the information that must be included in the [environmental] report [i.e. the SA Report], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁷ As such, these authorities were consulted on the SA scope in 2012. Since that time, the SA scope has evolved as new evidence has emerged - and in particular work has been undertaken to develop detailed site options appraisal criteria - however, the scope remains fundamentally similar to that agreed through the dedicated scoping consultation in 2012.

4.2 Key issues / objectives

4.2.1 **Table 4.1** presents the sustainability objectives established through SA scoping. Objectives are grouped under 18 sustainability 'topic' headings (and can also be grouped under six Community Strategy themes). Taken together, these sustainability topics and objectives provide a methodological 'framework' for appraisal.

⁷ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

Table 4.1: Sustainability topics and objectives (i.e. the SA framework)

Community Strategy theme	Sustainability topic	Sustainability Objectives
An enterprising city	Economic development and employment	Regenerate Croydon as a vital and diverse economic centre
		Encourage business opportunities in high areas of unemployment, such as the northern and south eastern wards of the Borough
A connected city	Transport	Promote public transport and improve conditions for all transportation users
		Reduce greenhouse gas emissions
		Promote the use of renewable energy
		Facilitate modal shift away from the private car
A sustainable city	Energy consumption	Reduce greenhouse gas emissions
		Increase the uptake of energy efficiency measures
		Promote the use of renewable energy
		Adaptation and resilience to climate change by minimising risk of overheating through design
	Biodiversity, flora and fauna	
		Increase quality and range of wildlife habitats in the borough
		Increase tree cover
	Water Use	Encourage more efficient use of water
		Adaptation and resilience to climate change and higher population
	Drainage, flooding and water quality	Reduce pollution to water
		Reduce flood risk in vulnerable communities
		Steer vulnerable development away from areas affected by flooding
		Adaptation and resilience to climate change
	Air quality	Reduce emissions of pollutants to air
		Reduce greenhouse gas emissions
	Waste	Promote waste minimisation, recycling and composting
		Reduce greenhouse gas emissions from waste
		Increase amount of energy generated from waste
	Noise	Reduce noise pollution, including reducing the adverse impacts of noise from traffic, freight, servicing, construction and demolition
	Conservation of the built environment	Maintain and enhance the historic environment
Bring forward investment in the historic environment for regeneration, reuse and adaptation		
Use heritage assets to provide educational opportunities and combat social exclusion		
Materials	Promote and increase use of building materials that have a low environmental impact	

Community Strategy theme	Sustainability topic	Sustainability Objectives
A caring city	Human health and wellbeing	Improve mental and physical wellbeing
		Support for carers and those with long term conditions
	Crime and Safety	Reduce anti-social activity, opportunities for crime and fear of crime
	Social inclusion and equality	Create community identity and sense of place
		Promote adaptable, durable and inclusive developments
	Housing	Everyone should have the opportunity to live in a decent home
		Improve housing conditions and reduce homelessness
Promote adaptable, durable and inclusive developments		
A learning city	Archaeological heritage	Maintain and enhance the historic environment
	Education, skills and training	Facilitate fair and equal access for all members of the community to education and training
		Improve educational and training facilities within the Borough
		Increase in places for children's education
A creative city	Culture, Sport & Recreation	Promote growth of creative industries and development of centralised hub to support creative businesses
		Support temporary use of vacant buildings and sites for creative/cultural activity
		Ensure that all communities have access to leisure and recreation facilities

PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5 INTRODUCTION (TO PART 1)

5.1.1 The aim of this part is to tell the 'story' of plan-making / SA that has led to the preferred approach to the Strategic Policies Partial Review. In-line with legislative requirements, there is a focus on explaining how consideration was given to 'reasonable alternatives'.⁸

5.1.2 Specifically, there is a focus on explaining how consideration was given to alternative approaches to **housing growth policy** (i.e. alternative approaches to reviewing Policy SP2: Homes / accommodating housing to 2036).

5.1.3 It was determined that *other policy areas* that are a focus of CLP1.1 (local heritage areas; archaeological priority zones; employment location designations; community facilities, public houses; and designation of an office retention zone) need not be a focus of alternatives appraisal. This was deemed a proportionate and 'reasonable' approach, as it was not immediately apparent that there were strategic choices to be made that might benefit from alternatives appraisal. This decision was reached in light of consultation responses received during the 2015 'Preferred and Alternative Options' consultation.

Structure of this part of the report

5.1.4 The following chapters essentially -

- 1) Explain the process of establishing reasonable alternatives;
- 2) Present the appraisal of the reasonable alternatives; and
- 3) Give the Council's response to the alternatives appraisal findings.

⁸ In-line with SEA Directive / Regulations requirements, the SA Report (i.e. the report published for consultation alongside the draft plan) must present information on 'reasonable alternatives' as well as 'an outline of the reasons for selecting the alternatives dealt with'.

6 ESTABLISHING REASONABLE ALTERNATIVES

6.1 Introduction

6.1.1 The aim of this chapter is to explain the work undertaken to establish ‘reasonable’ alternative approaches to **housing growth** policy, in order that they might be subjected to appraisal and consultation with a view to enabling effective and informed plan-making.

6.1.2 Essentially, alternatives were established subsequent to consideration being given to:

- A) Strategic considerations (relating both to growth *quantum* and broad *distribution*); and
- B) Site specific considerations.

6.2 Strategic considerations

Growth quantum

6.2.1 The National Planning Policy Framework (NPPF), at paragraph 47, is clear that authorities should “*use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with [sustainable development considerations]*”. The 2014 Strategic Housing Market Assessment (SHMA) for Croydon established that objectively assessed housing need (OAHN) equates to **2,437 dwellings per annum (dpa)**. Delivering this level of growth would ensure that Croydon contributes to addressing housing need within the sub-regional and London housing market areas (HMAs), and hence potentially has merit as an option. However, the Council is clear that there is not the capacity to deliver this level of growth within Croydon, given the need to take into account policy relating to the protection of Green Belt, open space, employment land etc.

6.2.2 The SHMA also produced an OAHN figure based on the methodology used in the GLA’s SHMA for the Further Alterations to the London Plan (FALP), but based on the GLA’s updated 2014 population projections and household projections. Using this methodology and these projections, Croydon’s OAHN **2,162 dpa** and this is the OAHN figure accepted by the Council. The Council recognised that delivering this level of growth would lead to conflicts with other policy objectives (relating to Green Belt, open space, employment land etc); however, it was determined that negative impacts might potentially be acceptable (with mitigation in place) and hence there was a reasonable need to explore the 2,162 dpa option in detail.

6.2.3 NPPF paragraph 47 does ‘leave the door open’ to the option of providing for a level of growth below that necessary to meet OAHN, i.e. it can be appropriate on the basis of sustainable development considerations. In Croydon’s case, the Further Alterations to the London Plan (FALP) target of **1,435 dpa** was developed taking into account development capacity / sustainable development considerations, and hence it was determined that this level of growth has merit as an option.

6.2.4 Ultimately, the Council determined that there was a (‘reasonable’) need to test two alternative growth quanta: **1,435 dpa; and 2,162 dpa**. This decision was reached in light of representations made through the 2015 Preferred and Alternative Options consultation, e.g. the House Builders Federations set out that:

“Croydon Council will need to show that it is alerting its neighbouring authorities to the consequences of this projected growth in households in London which is reflected in a) the Mayor’s underlying migration assumptions; b) the likelihood that the London boroughs will not be able to close the gap between the identified supply of 42,000 dwellings a year and the lower end of the OAN of 49,000 dwellings per year; and c) Croydon’s own local assessment of its OAN which indicates a need for a possibly much higher number of dwellings.”

Broad spatial strategy

6.2.5 Policy SP1 of the adopted Strategic Policies describes the broad spatial strategy as follows: “Croydon Opportunity Area will be the primary location for growth, with the Places of Waddon, Purley, Coulsdon, and Broad Green and Selhurst also playing a substantial role.” Policy SP2 then provides further detail, explaining that almost 56% of planned growth (i.e. 7,300 of the 12,900 homes that the adopted Strategic Policies document states should be delivered through CLP2) should be delivered within the Croydon Opportunity Area.

6.2.6 This broad spatial strategy was established on the basis of detailed work undertaken between 2009 and 2011, which included appraisal and consultation on alternative spatial strategies. The SA Report submitted alongside the Croydon Strategic Policies (or ‘Core Strategy’, as it was then) explains how this was an iterative process, with the 2009 Issues and Options stage initially considering two broad alternatives: dispersed growth, in-line with existing infrastructure capacity vs. a focus on the Croydon growth corridor, i.e. Croydon Town Centre and along the A23 transport corridor, north to Norbury, north east to South Norwood and southward down through Waddon, Purley and Coulsdon. Neither approach was taken forward wholesale, but rather a preferred strategy was developed that was something of an intermediary of the two approaches, and this approach went through further testing. Specifically, the strategy was tested (through appraisal and consultation) at the ‘Towards a Preferred Strategy for Croydon’ stage in 2010, with the consultation document at that time explaining that the preferred strategy sought to reflect the needs / priorities of four spatial management areas: North (Crystal Palace and Upper Norwood; Norbury; South Norwood and Woodside; Thornton Heath); Centre and Environs (Addiscombe, Broad Green and Selhurst; Croydon Metropolitan Centre; South Croydon; and Waddon); East (Addington; Kenley and Old Coulsdon; Sanderstead; Selsdon; and Shirley); and South (Coulsdon; Purley). Within each spatial management area, the preferred strategy reflected one or a combination of the following priorities: Renewal and Growth (promote and support new development and intensification in areas of high accessibility); Managed Change (direct development to where new facilities are needed to meet the needs of sustainable communities); and Conservation and Enhancement (limit the amount of change to that which does not alter the character of an area).⁹

6.2.7 When looking to develop housing policy alternatives the Council’s view was essentially that:

“The adopted broad spatial strategy remains fit for purpose, and there are no strategic considerations (‘drivers’) that suggest a need for a change of tack. It remains the case that there is merit in focusing development efforts at Croydon Metropolitan Centre (first and foremost), District Centres, Local Centres and other locations well connected by train or tram to London and Gatwick/Brighton to the south (see Figure 6.1); whilst also recognising that there are less accessible areas where some development can and should support beneficial change. Whilst there is now a view that there should be an increased emphasis on sustainable growth of the suburbs, and it is no longer considered that Coulsdon should be discussed as a particular location for growth, this is a minor evolution of policy rather than a substantial shift.”

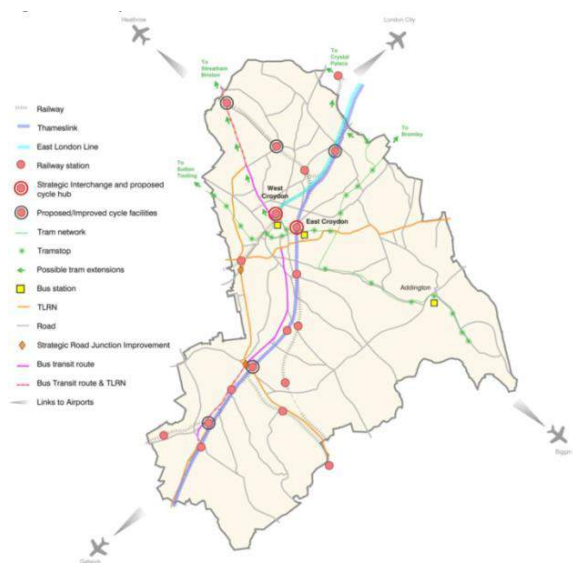


Figure 6.1: Transport and communication¹⁰

6.2.8 Ultimately, it was determined that there was no (‘reasonable’) need to explore

⁹ More information can be found within the 2011 SA Report at croydon.gov.uk/planningandregeneration/framework/localplan/clppolicies
¹⁰ Figure 5-7 from the adopted Croydon Strategic Policies

alternative approaches to broad spatial distribution; and consultation responses would seem to endorse this approach (although the representation made by the HBF - see paragraph 6.2.4 above - highlights the need to consider spatial strategy at the sub-regional, HMA scale).

6.3 Site specific considerations

- 6.3.1 The Council has undertaken a considerable amount of work to identify and appraise site options, leading to a situation at the current time whereby the Council is able to differentiate between the merits of both urban and greenfield sites. The process of identifying and appraising site options is explained in Part 1 of the SA Report published alongside the CLP2 Proposed Submission Plan at the current time - see <https://www.croydon.gov.uk/planningandregeneration/framework/localplan/sustainabilityapp>

6.4 Establishing reasonable alternatives

- 6.4.1 Taking into account the above considerations, the Council's view was essentially that:

There is a 'reasonable' need to give detailed consideration to the option of meeting the London Plan target (1,435) and the option of providing for a higher level of growth (2,162) in order to more fully meet housing needs. Whilst there are arguments in favour of providing for a higher level of growth, the Council does not believe that there is compelling evidence to suggest that this is an option that should reasonably be considered further (i.e. feed into development of housing growth alternatives) due to clear tensions with the National Planning Policy Framework, National Planning Practice Guidance and London Plan policy in terms of delivering sustainable growth within the urban area, without strategic release of Green Belt and Metropolitan Open Land.

The London Plan target of 1,435 dpa can be delivered (and possibly marginally exceeded) through development of urban sites only, and the site specific work discussed above has enabled the identification of a preferred approach to delivering this level of growth. Recognising the need to protect employment land, avoid development at inappropriately high densities (in both town centres and suburbs), protect open space and respect infrastructure constraints it is not thought that there is a need to test alternative ways of distributing this lower growth figure at the current time.

These constraints to growth in the urban area are significant, and hence it is felt that even if there was a need to deliver a higher growth strategy of 2,162 dpa there would not be the potential to deliver significantly more homes in the urban area. Rather, there would be a need to look to greenfield sites in the Green Belt. As for precisely which greenfield sites, it is again the case that a preferred approach emerges from site specific work, i.e. it is not thought that there are strategic choices to make regarding distribution of a higher growth strategy.

- 6.4.2 Ultimately, it was determined that there was a ('reasonable') need to explore two housing policy alternatives - see **Figures 6.2 and 6.3**.
- 6.4.3 Final points to note are -
- The alternatives are **indicative**; hence the specifics of Figure 6.1 should not be relied upon to generate an understanding of the Council's preferred option.
 - The alternatives are unchanged from those developed / appraised / consulted-on in 2015.

Figure 6.2: London Plan target (1,435 dpa) delivered at preferred urban sites (indicative)

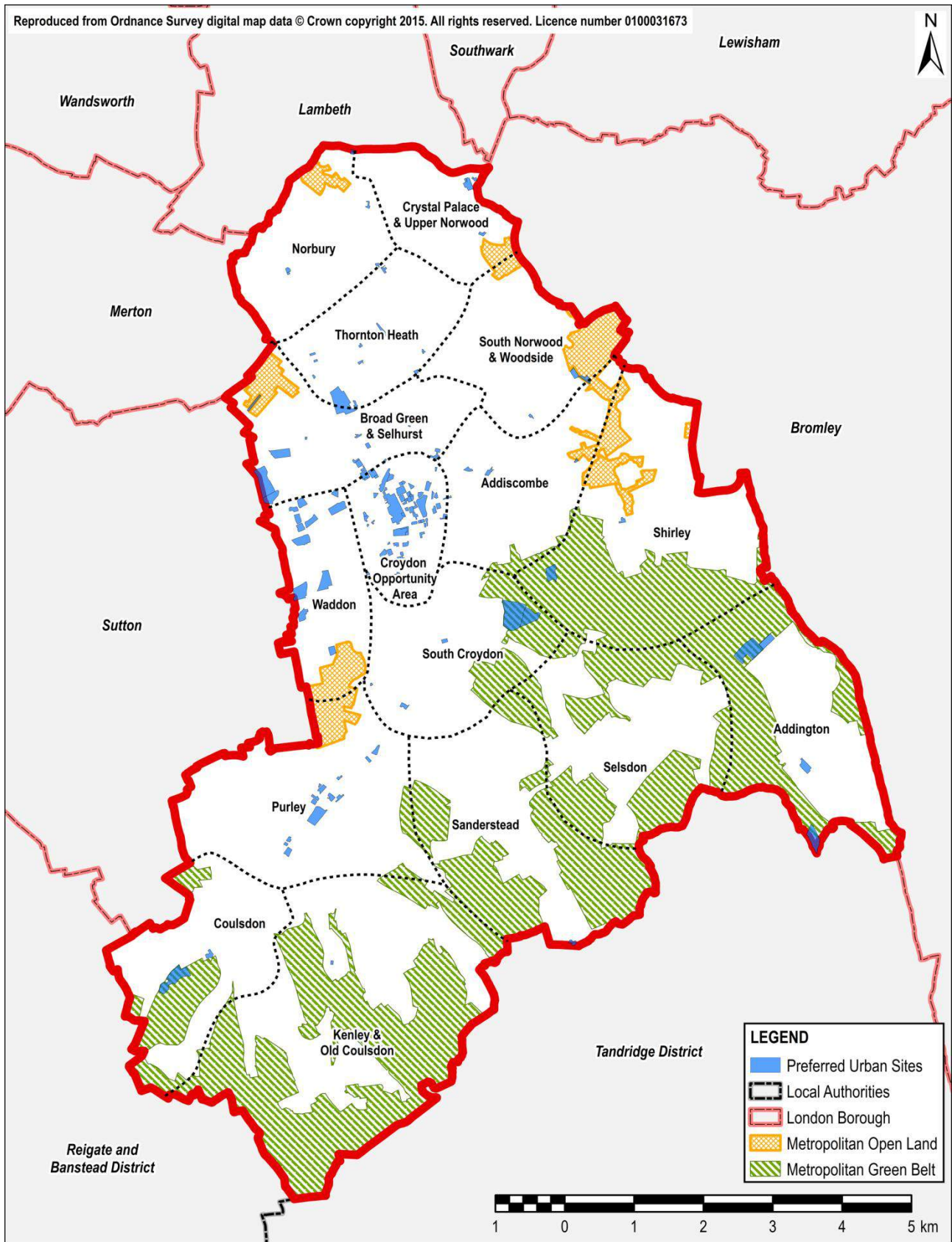
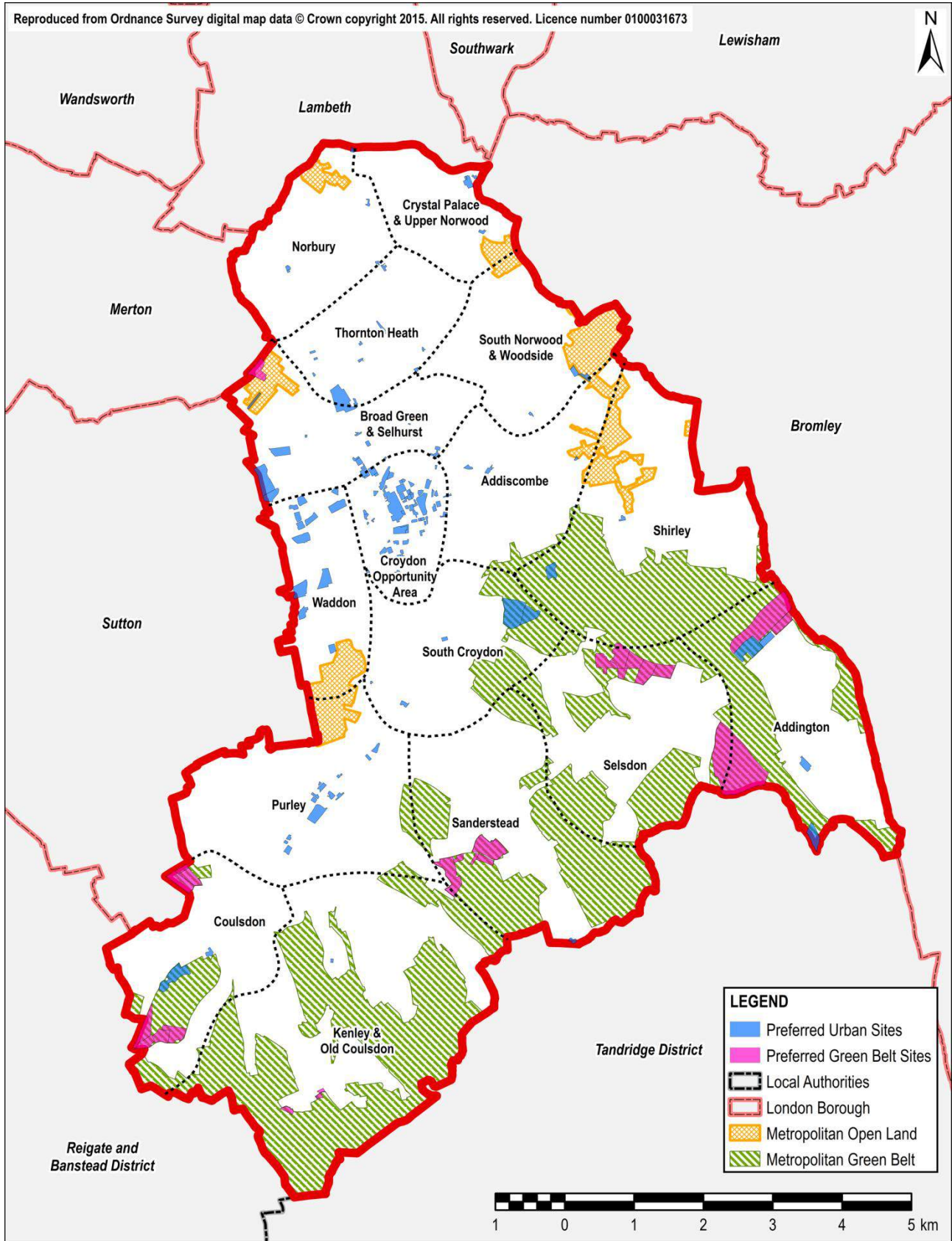


Figure 6.3: Higher growth (2,162 dpa), with approximately 1,435 dpa delivered at the preferred urban sites (indicative) and the residual need at preferred greenfield sites



7 ALTERNATIVES APPRAISAL

7.1 Introduction

7.1.1 The aim of this Chapter is to present an appraisal of the two alternative approaches to housing growth policy introduced in Chapter 6.

N.B. Appraisal findings are consistent with those presented within the 2015 Interim SA Report.

7.2 Appraisal methodology

7.2.1 For each of the options, the appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability themes / objectives / issues identified through scoping (see Part 1) as a methodological framework. **Red** text / shading is used to indicate significant negative effects, whilst **green** text / shading is used to indicate significant positive effects.

7.2.2 Effects are predicted taking into account the criteria presented within the SEA Regulations.¹¹ So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for 'cumulative' effects is also a consideration.

7.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the alternatives. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how each option will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

7.2.4 In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

¹¹ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

7.3 Appraisal findings

7.3.1 Summary appraisal findings are presented below, whilst detailed appraisal findings are presented in **Appendix II**.

7.3.2 To reiterate, for each sustainable topic, the alternatives are ranked in order of preference (1 being the highest preference) and efforts are also made to categorise performance in terms of ‘significant effects’ (using **red** and **green** shading). Also, ‘ = ’ is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them); and ‘ - ’ is used to denote instances where the objective in question is not applicable.

Table 7.1: Summary appraisal findings - Alternative approaches to housing growth policy

Topic	London Plan target (1,435 dpa) delivered at preferred urban sites	Higher growth (2,162 dpa), with approximately 1,435 dpa delivered at preferred urban sites and the residual need at preferred greenfield sites
Economic development & employment	2	★1
Transport	★1	2
Energy consumption	2	★1
Biodiversity, flora and fauna	★1	2
Water use		-
Drainage, flooding and water quality		=
Air quality	★1	2
Waste		-
Noise		=
Materials		-
Human health and wellbeing		=
Crime and Safety		=
Social inclusion and equality	2	★1
Housing	2	★1
Archaeological heritage		-
Education, skills and training		=
Culture, Sport & Recreation		=

The alternatives appraisal highlights that whilst Option 2 (higher growth with Green Belt release) has merit in terms of socio-economic objectives, more notable are the relative disbenefits of this option in terms of transport/traffic and natural environment objectives. This conclusion is reached taking some account of Green Belt sites that would likely be released, hence the Council might wish to investigate other higher growth options, e.g. options that would concentrate growth to a greater extent and/or ensure a clear focus on the least sensitive areas. However, at the current time it is fair to conclude that Option 1 is favourable.

8 DEVELOPING THE PREFERRED APPROACH

8.1 Introduction

8.1.1 The aim of this chapter is to present the Council's reasons for selecting/developing the preferred approach (i.e. the preferred approach to reviewing Policy SP2 Housing), in light of the alternatives appraisal findings presented above and other considerations.

8.2 The Council's reasons

8.2.1 The key catalyst for the partial review is the adoption of the Further Alterations to the London Plan (FALP), which increased the borough's housing target from 1,330 dpa to 1,435 dpa. Adoption of this target by the Mayor has rendered the existing housing requirements in the Croydon Local Plan: Strategic Policies obsolete. This combined with the desirability of extending the life of the Croydon Local Plan: Strategic Policies, and having an up to date development plan, provides the justification for undertaking the partial review.

8.2.2 The FALP sets a 20 year housing target of 42,000 dpa for London, and for Croydon a figure of 1,435 dpa. However, these figures are driven by the Mayor's Strategic Housing Land Availability Assessment (SHLAA), i.e. reflecting capacity considerations. The Mayor's OAHN for London is 49,000 per annum. As such, the Mayor is clear that planning for the FALP target alone will not be sufficient to achieve the statutory requirement of general conformity with the London Plan; rather, Councils have to demonstrate how they are seeking to exceed their FALP target and therefore contribute to the 49,000 per annum target.

8.2.3 In addition to the FALP housing target the Council has undertaken a SHMA. A SHMA is an objective assessment of housing need produced in accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG). Paragraph 159 of the NPPF requires local authorities to have a clear understanding of housing needs in their area by preparing a SHMA. The SHMA assesses the quantity of housing needed in Croydon up to 2036, looking at overall housing need, affordable housing need and also the needs of different groups (including older people, people with disabilities, BME households, households with children, and young people).

8.2.4 Ultimately, the SHMA established an overall housing need (based on the 2012 - based subnational population projections and the 2011 household projections produced by DCLG) of 2,437 dpa from 2013 to 2036, representing an additional 56,000 homes. The SHMA has also produced a figure based on the methodology used in the GLA's SHMA (i.e. that which informed the FALP), but based on the GLA's updated 2014 population projections and household projections. Using this methodology and these projections, Croydon's overall housing need is 2,162 dpa (48,740 dwellings in total) and this is considered to be the borough's objectively assessed housing need.

Summary of Croydon's housing figures

Source	Dwellings per annum (total in plan period)
Further Alterations to the London Plan 2015	1,435* (28,700)
Further Alterations to the London Plan 2015 – Central variant (based on the GLA's updated 2014 population projections and household projections)	2,162 (43,240)
Strategic Housing Market Assessment	2,437 (48,740)

* This is the preferred option

- 8.2.5 The preferred approach for the Croydon Local Plan: Strategic Policies Partial Review is to accommodate the FALP housing target (1,435 dpa), and seek to exceed it in a sustainable manner in the context of the FALP – Central variant (based on the GLA's updated 2014 population projections and household projections) figure of 2,162 dpa.
- 8.2.6 This will be achieved by accommodating growth within the existing urban area. More specifically, this will be achieved through the Croydon Opportunity Area (COA) accommodating at least 10,100 dwellings, sites beyond the COA being allocated at least 7,730 dwellings, sustainable growth of the suburbs, growth within district and local centres and windfall sites achieving in the region of 9,210 dwellings. Alongside, previous completions and bringing vacant buildings back into use it is anticipated just over 31,850 dwellings will be delivered over the plan period 2016 – 2036.
- 8.2.7 This preferred approach is considered to be in conformity with the NPPF, NPPG and FALP policy in terms of delivering sustainable growth within the urban area, without the release of Green Belt and Metropolitan Open Land. The national and London Plan policy context is very clear that residential development in the Green Belt and / or Metropolitan Open Land is inappropriate development and such development is only justifiable in very special circumstances. Housing need is not considered to represent very special circumstances by this policy context. With general conformity with higher level policy a requirement of Local Plan soundness, it is clear a departure from this policy context cannot be justified, nor is it necessary as the FALP housing target (1,435 dpa) can be achieved.
- 8.2.8 Furthermore, through the SA process, evidence has been generated that indicates to the Council that accommodating development within the existing urban area is the most sustainable option, notwithstanding the economic development and employment benefits of the managed release of Green Belt and Metropolitan Open Land.
- 8.2.9 What the Proposed Submission Plan demonstrates is that in the face of the considerable population growth London faces - and as a consequence, the challenges Croydon faces in looking to meet housing need (and address the unarguable need for affordable housing) - Croydon is willing to plan for sustainable growth.

PART 2: WHAT ARE THE SA FINDINGS AT THIS STAGE?

9 INTRODUCTION (TO PART 2)

9.1.1 The aim of this chapter is to present an appraisal of CLP1.1, as understood from the current Proposed Submission version of the plan document. Account is also taken of the preferred approach presented within the Croydon Local Plan: Detailed Policies and Proposals (CLP2) Proposed Submission document. Thus...

... the information presented below is **identical** to that presented within Part 2 of the Croydon Local Plan: Detailed Policies and Proposals (CLP2) SA Report.

Methodology

9.1.2 The appraisal identifies and evaluates 'likely significant effects' of the preferred approach - as understood from the two consultation documents currently out for consultation - on the baseline, drawing on the sustainability topics and objectives identified through scoping (see Chapter 4, above) as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

- Economic development and employment
- Transport
- Energy consumption
- Biodiversity, flora and fauna
- Water Use
- Drainage, flooding and water quality
- Air quality
- Waste
- Noise
- Conservation of the built environment
- Materials
- Human health and wellbeing
- Crime and Safety
- Social inclusion and equality
- Housing
- Archaeological heritage
- Education, skills and training
- Culture, Sport & Recreation

9.1.3 Every effort is made to predict effects accurately; however, this is inherently challenging given limited understanding of what will happen 'on the ground' as policies are implemented. The potential to identify effects accurately is also limited by understanding of the baseline.

9.1.4 Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the preferred approach in more general terms.

9.1.5 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.¹² So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

¹² Environmental Assessment of Plans and Programmes Regulations 2004

Added structure

- 9.1.6 Although, under each of the 18 topic heading, there is a need to focus on the effects of the preferred approach - as understood from the two plan documents - 'as a whole', it is helpful to break-up the appraisal under the following sub-headings:
- Strategic Policies Partial Review
 - Development management policy
 - Place and site specific proposals
 - Discussion under these headings reports the outcomes of criteria-based, GIS analysis undertaken on site options (as introduced in section 6.3 of the CLP2 SA Report)
 - The emerging preferred approach 'as a whole'
- 9.1.7 As such, the appraisal below is presented as 72 (18 x 4) separate appraisal narratives. Within each narrative, reference is made to specific policies/proposals as necessary, but it is deemed appropriate to stop well short of giving standalone consideration to each in isolation under each topic heading.

10 APPRAISAL OF THE PROPOSED SUBMISSION PLAN

10.1 Introduction

- 10.1.1 As introduced above, the aim of this chapter is to present an appraisal of both CLP1.1 and CLP2 'under' the SA framework.

10.2 Economic development and employment

Sustainability objectives are to -

- Regenerate Croydon as a vital and diverse economic centre
- Encourage business opportunities in high areas of unemployment, such as the northern and south eastern wards of the Borough

Strategic Policies Partial Review

- 10.2.1 The 2011 Strategic Policies SA Report predicted broadly positive effects, including on the basis that: *"The cumulative effect of the policies regarding improvements to the public realm, developing sustainable transport infrastructure, improving connectivity and accessibility and facilities for local residents, are all likely to improve the image of Croydon as a place people want to live work and visit and encourage inward investment."*
- 10.2.2 No policies were identified as having the potential to lead to negative effects, although one tension was highlighted in that:
- "There is a focus within the policies on the need to locate new development near existing centres and in locations accessible by public transport, walking and cycling. However, new development (including new housing, employment development, new community facilities and educational development) is likely to cumulatively generate some new traffic... the overall increase in traffic... could affect a wider area, such as neighbouring boroughs."*
- 10.2.3 Policy SP3 (Employment) was given particular attention as it outlines how the Council will encourage innovation and investment in the borough, support industry and warehousing, promote the growth and expansion of cultural and creative industries and maintain the role of town centres.

- 10.2.4 The Partial Review proposes some notable amendments to Policy SP3:
- There is an updated approach to office space retention, and development of new office space. This reflects the latest situation whereby approximately half of the office floor space in Croydon Metropolitan Centre is vacant and current low rents do not support the development of new floor space. Specifically, there is new policy support for the area around East Croydon Station and New Town performing the role of Croydon's office centre, with a new designation added to the Policy Map. Within the 'Office Retention Area' the loss of floor space will be permitted only if it is demonstrated that *"there is no demand for refurbished floorspace, a scheme with no loss of office floor space and that there is no demand for a mixed use development that includes proportionate office floor space."*
 - Whilst the proposal is to maintain the '4 tier' approach to the protection of industrial capacity, there are some amendments to the policy approach (and some consequential changes made to designated locations). Notably:
 - There is a new reference to: *"The fringes of some Tier 1 and Tier 2 locations... have the potential for transition through development that enables the locations to relate better to their surrounding uses and character. This transition could come in the form of both intensification of development or the introduction of new land uses or mix of land uses."*
 - Reference to the need for mixed use developments within designated industrial locations to 'not result in a net loss of floor space' has been deleted, with the remaining policy requirement being that mixed use development: *"must not result in an increase in operational difficulties for businesses"*. Text is also added stating that: *"Where an applicant is proposing a mixed use scheme which involves a reduced amount of Industry and Warehousing space, account would be taken of the proposed end user of the Industry and Warehousing and, the nature and type of the proposal in terms of meeting the Plan's vision and the Council's Economic Development Strategy."*
 - There is a new reference to Tier 2 sites (previously just Tier 4 sites were referenced) potentially being suitable for change of use to D1 Use Class activities (non-residential institutions). Ultimately, the aim is to ensure that 'Tier 1' type premises are not lost to community uses to the detriment of the area's business function (something that has occurred in the past). Change of use will only be allowed in the more accessible Tier 2 locations, and will open up a significant supply of premises for community uses/groups.
- 10.2.5 Finally, it is important to consider the implications of removing references to Coulsdon as broad locations for growth, and inserting new references to 'sustainable growth of the suburbs'.
- As for Coulsdon, this is an accessible location in the south of the borough, and hence it is potentially the case that there are some growth related economic opportunities. It is noted that reference to development of a Science and Business Innovation Park / Enterprise Centre at Cane Hill (an initiative first promoted through the 2006 Unitary Development Plan) is set to be deleted and the site has consent for a residential scheme.
 - As for the concept of sustainable growth at the suburbs, it is not clear that this has significant implications, although benefits might result from a diversification of the borough's employment space offer.

Development management policy

- 10.2.6 Policies DM5 (Development in Croydon Metropolitan Centre, District and Local Centres), DM7 (Development in shopping parades) and DM9 (Development in edge of centre and out of centre locations) will support the sustainability objectives by supporting and potentially increasing the vitality and viability of Croydon's centres and shopping parades. Retailing is at the heart of the borough's town centres, and development management policy will have a key role to play in ensuring continued functioning of this role. Notably, DM7 is clear that proposals involving an increase of non-retailing ground floor space within parades will be refused unless it relates to a Community Use or change of use to office use. The reference to B1 use is important as Parades can provide space for small start-up companies who need office or workshop space (although new office development is unacceptable, as this type could threaten the retail character of a Parade in a way that change of use would not). The policy also sets out that A5 uses (hot food takeaways) are not acceptable in shopping parades. Should occupancy rates for other uses be low, then this might prevent full occupancy of shopping parades. The counter point to this is a greater choice of retail units.
- 10.2.7 Policy DM8 (and associated change to the Policy Map) will also contribute positively to objectives by ensuring that the vitality and viability of the borough's Restaurant Quarters are maintained and increased. A survey of South End indicated that the cluster of bars and restaurants is significant not only in terms of the cultural and leisure offer, but also as a generator of direct and indirect employment. The policy differs from that which relates to Shopping Parades by not placing a limit on the number of restaurant/bar uses within the frontage. The policy also limits hot food takeaways, which could undermine function.
- 10.2.8 Following on from the discussion of the Strategic Policies Partial Review above, Policy DM11 is notable as it lends some support for the redevelopment of Industrial Locations at higher densities. This is intended to reduce the loss of industrial/ warehouse capacity from the borough. It is noted that there are isolated examples where higher densities have been achieved without compromising the operational ability of the premises and hence the Council is keen to see more of this type of development. However, there is some uncertainty regarding the long term implications of this policy approach.
- 10.2.9 Other policies will also have a bearing on economic objectives. For example Policy DM16 seeks to facilitate regeneration through enabling developing of tall buildings in appropriate locations, creating new jobs, homes and community facilities; and Policy DM30 requires new development to promote measures to increase the use of sustainable transport modes and to avoid a "severe impact" on traffic congestion will ensure that development does not detract from the economic and environmental regeneration of Croydon by making the area less accessible and a less attractive location in which to develop.
- 10.2.10 Finally, it is noted that Policy DM19 (Heritage assets and conservation) could perhaps give greater emphasis to the opportunities for heritage-led regeneration. The supporting text notes that the Council supports the principle of heritage-led regeneration but no details are provided.

Place and site specific proposals

- 10.2.11 It is helpful to consider the location of proposed site allocations in relation to existing employment areas, which are mainly concentrated in two 'Croydon Places': Broad Green and Selhurst and Waddon. This concentration is to the west of Croydon Town Centre, on the western edge of the Borough Boundary. The larger parcels (mainly within Waddon) are also designated as 'strategic' employment areas. Finally, there is one employment area (which, although large, is not designated as 'strategic') within Coulsdon, in the south of the Borough.

- 10.2.12 Analysis of reasonable site options in 2015 identified that:
- Five site options entirely intersect with an employment area, whilst another two partially intersect. These sites are all located in Waddon or Broad Green & Selhurst. Of the five sites that entirely intersect, 60% are preferred sites, whilst both of the sites that partially intersect are preferred sites. Of the five preferred sites that intersect, four are proposed for residential or mixed use redevelopment, and one is proposed for use as a Creative and Cultural Industries Enterprise Centre (plus residential development).
 - Eight sites are adjacent to an employment area. Six of these are located in Waddon, whilst two are located in Broad Green & Selhurst. 100% are preferred sites and all are proposed for mixed use.
 - 48 site options benefit from being within close proximity to an employment area. Of these, 65% are preferred sites. The majority of these preferred sites are located within Broad Green & Selhurst or the Croydon Opportunity Area.
- 10.2.13 Redevelopment of employment land leads to important considerations, given the London-wide trend towards redeveloping industrial areas for mixed-use development.¹³ There will often be a need to mitigate for the loss of existing employment land through development management policy, particularly where there is a spatial concentration and hence a situation where existing employment types will be lost from the local area, leaving some local residents (whose skill set is not easily transferred to other types of employment) at risk of unemployment.
- The emerging preferred approach as a whole
- 10.2.14 Supporting an increase in the rate of housing growth within the borough will help to ensure that employment / economic growth opportunities are realised; and given the decision to largely role forward the adopted spatial strategy, the effect should be to ensure that opportunities at Croydon Metropolitan Centre are fully realised. However, it is noted that the Council's Strategic Housing Market Assessment (SHMA) suggests a need to deliver a yet higher level of growth. It could be the case that a higher housing growth strategy would support the achievement of economic growth objectives, given Croydon's strategic position within the sub-region; however, this is somewhat uncertain.

¹³ Notably, Ferm and Jones (2015, see <https://justspacelondon.files.wordpress.com/2015/02/ferm-jones-londons-industrial-land-working-paper-final1.pdf>) have "grappled with the divisive question of whether or not the continued separation of industrial land is desirable [and] asked, whether it is possible, through clever urban design, to accommodate businesses currently occupying industrial land within a higher density mixed use context." Ferm and Jones conclude that: "*The ongoing loss of industrial land is being driven largely by real estate speculation rather than deindustrialisation. Evidence for the actual state of industrial land - who does business there, how those businesses are linked together and embedded in the places they occupy - is thin on the ground. This lack of information means the impact of this loss of industrial land is a worrying mystery; the current move away from separating industrial land towards mixed use in London's built environment - both on ideological grounds and in response to housing need - needs to be much better understood. There is an urgency to this. The UK Government has proposed to further deregulate the planning system to facilitate conversion of industrial land to housing without the need for planning permission. Concern is particularly acute in London where differences between industrial and residential land values are likely to drive redevelopment if Permitted Development Rights are extended.*" The 'ideological argument' against separating industrial from other land uses suggests that such zoning does not support compact, diverse and vibrant city environments. This resonates with the views of the Deputy Mayor for Business and Enterprise, who Ferm and Jones quote as stating: "The idea of an industrial park is really a Modern phenomenon... what we will return to is a 19th Century model, where industry is mixed around housing." In response, Ferm and Jones state that they have "sympathy with the position of urbanists and economists who deride the concept of land use separation in the modern urban context [but] feel that in London at least the imbalance of land values and the strength of the residential property market means that we now have little alternative."

- 10.2.15 A number of other notable changes are set to be made to policy, essentially in response to national policy and local evidence. Designation of an Office Retention Area is a positive step on the Council's part, with no draw-backs having been identified. The proposal to modify the policy approach to protecting industrial/warehouse capacity is more contentious; however, it is recognised that London Plan Policy parameters limit the Council's options. There is currently active debate regarding the London-wide trend towards redeveloping industrial areas for mixed-use development, and so a 'watching brief' may be necessary. In particular, it will be necessary to consider the potential for redevelopment affecting employment sites within Waddon and Broad Green & Selhurst to have an effect on local communities (recognising that there will be those within local communities who are reliant on light industrial employment, and may find it difficult to transition to other employment).

10.3 Transport

Sustainability objectives are to -

- Promote public transport and improve conditions for all transportation users
- Reduce greenhouse gas emissions
- Promote the use of renewable energy
- Facilitate modal shift away from the private car

Strategic Policies Partial Review

- 10.3.1 The 2011 Strategic Policies SA Report predicted that the spatial strategy would lead to positive effects on the basis that growth would be *"concentrated within Croydon's Metropolitan Centre, local and district centres [and thus] maximise sustainable transport opportunities and improve accessibility as existing infrastructure is in place."* The appraisal also focused on Strategic Policy SP8, which provides a strategic overview for reducing congestion and improving highway safety.
- 10.3.2 The Partial Review consultation document does not propose any amendments to the wording of SP8; however, some amendments to supporting text are proposed. These amendments all reflect factual updates, and specifically comprise explanations of the latest situation with regards to various infrastructure upgrades either underway or being planned by Transport for London, Network Rail or other providers. For example, it is clarified that: *"Transport for London is currently investigating potential options for improvements to Addington Village bus station and interchange."* These proposed amendments to supporting text do not reflect any new or amended policy commitments on the Council's part.
- 10.3.3 Another effect of the Partial Review will be to introduce a new 'Neighbourhood Centres' designation, with 18 areas identified as such on the policies map. As stated within the consultation document: *"These offer the opportunity for clusters of uses, in particular community uses, to emerge with support through planning policy. The identification of Neighbourhood Centres goes beyond recognising centres solely for their retail function, but for the wider role they play in supporting the local community."* It is fair to assume that this new policy focus will help to ensure that Neighbourhood Centres remain vibrant and well-used in the long term, helping to ensure that residents can meet a range of needs via walking or cycling, as opposed to having to travel to higher order centres (potentially by private car).
- 10.3.4 Finally, there is a need to consider the implications of removing references to Coulsdon as broad locations for growth, and inserting new references to 'sustainable growth of the suburbs'.
- Coulsdon District Centre has a PTAL rating of 3 (i.e. a moderate level of accessibility), but to the south of the district centre PTAL is poor (with areas of level 1 and level 0).
 - Traffic is another consideration, and on this basis it is important to consider that many residents of Coulsdon would look to travel south along the A23 / M23, away from congestion hotspots.

- Sustainable growth of the suburbs should take place at a steady pace over the plan period, enabling public transport infrastructure to be upgraded and hence PTAL improved. Nonetheless, the concern is that development in the early years might necessitate increased provision of private car parking and lead to entrenched car dependency. There will be an important role to be played by site/project specific transport assessment studies.

Development management policy

- 10.3.5 Policy DM30 (Promoting sustainable travel and reducing congestion) requires new development to promote measures to increase the use of public transport, cycling and walking and to avoid a “severe impact” on traffic congestion. Thus it should have a positive effect on a range of sustainability objectives. To give greater clarity to developers the Council should consider defining “severe impact” and the measures sought to increase the use of public transport, cycling and walking.
- 10.3.6 Policy DM31 (Parking in new development) will also support objectives by requiring development to “*Reduce the impact of car parking in any development located in areas of good public transport accessibility*” (the meaning of “reduce the impact of” could perhaps be clarified here i.e. does this simply mean provide less parking?) and “*Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking*”. Site specific transport assessments will have an important role to play in areas of poorer PTAL, with enhanced parking acceptable where the transport assessment demonstrates that “*public transport provision will not be sufficient to service the development within the first three years following granting of planning permission, that it is not reasonable to walk or cycle to the nearest railway station, and that there is no interest from car clubs in operating from the location at the time planning permission is sought.*” The recognition that major schemes in urban areas should have greater car club or car pool spaces is welcomed.
- 10.3.7 More generally, Policy DM35 (Positive character of the places of Croydon) states the Council will support the intensification of areas where there is adequate provision of community infrastructure and good accessibility to public transport. Similarly, policy DM16 states that tall buildings should be located “*within areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4 with direct public transport connections to the Croydon Opportunity Area*”.

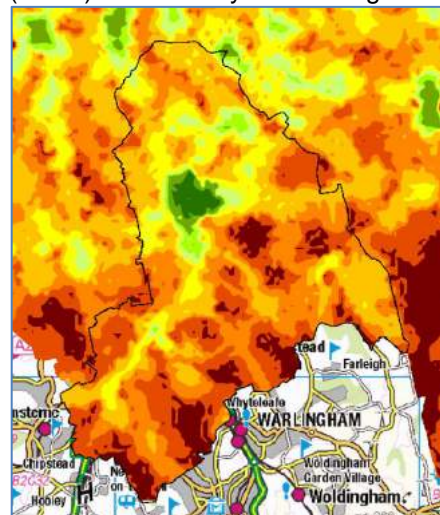
Place and site specific proposals

10.3.8 It is helpful to consider the location of proposed site allocations in relation to areas of high/low public transport accessibility. Levels of public transport accessibility (PTAL) vary throughout the borough with the highest levels being around central Croydon which is served by East Croydon and West Croydon railway stations, the Croydon Tramlink and numerous bus services. Generally, some significant areas in the south of the borough have low public transport accessibility, particularly the areas of Coulsdon, Mitchley Wood, Selsdon, Coombe Wood and Addington.

10.3.9 Analysis of reasonable site options in 2015 identified that:

- 80 site options intersect with an area with **good PTAL** (level 5 or 6). Of these, **83% are preferred sites**. The vast majority (86%) of these preferred sites with good PTAL are located in the Croydon Opportunity Area.
- 133 site options intersect with an area with **poor PTAL** (level 1 or 2). Of these, **30% are preferred sites**, with nine located in Shirley, seven in Broad Green & Selhurst and four in each of Addington, Thornton Heath and Waddon.

Public Transport Accessibility Levels (PTAL) across Croydon Borough



The emerging preferred approach as a whole

10.3.10 Supporting an increase in the rate of housing growth within the borough does not in itself lead to notable implications for transport/traffic related objectives; however, it is noted that the proposed fairly minor shift in spatial strategy (in particular, the proposed increased emphasis on sustainable growth of the suburbs) is less than ideal.

10.3.11 Introducing a new 'Neighbourhood Centres' designation is a very positive step from a transport/traffic perspective, with no draw-backs having been highlighted (in terms of transport/traffic objectives, or any others). It will be important to ensure that the policy approach to these areas is flexible, and is monitored closely / reviewed regularly to ensure that opportunities to develop these locations as 'community hubs' are fully realised.

10.3.12 As for the performance of site specific proposals, it is the case that the strategy of focusing growth within the Croydon Opportunity Area means that the average Public Transport Accessibility (PTAL) level of proposed allocations is high. However, it is still the case that a number of sites will be allocated at locations with a low PTAL score, particularly in Broad Green & Selhurst and Thornton Heath. Some of these sites are also located beyond easy walking distance of a local centre (i.e. an area where retail and potentially services/facilities can be accessed). Mitigation, in the form of accompanying public transport improvement or development of a local centre etc, should be considered.

10.4 Energy consumption

Sustainability objectives are to -

- Reduce greenhouse gas emissions
- Increase the uptake of energy efficiency measures
- Promote the use of renewable energy
- Adaptation and resilience to climate change by minimising risk of overheating through design

Strategic Policies Partial Review

- 10.4.1 Recognising that car dependency / distance travelled by car is discussed within the Chapter above, the focus here is on the potential to support reduced per capita carbon emissions through the built environment, i.e. through supporting delivery of renewable or low carbon energy technologies and also energy efficiency through sustainable design and construction measures. Adopted Strategic Policy SP6 currently requires district energy networks where opportunities exist due to high heat density¹⁴ or an increase in heat density brought about by new development. The benefits of this policy approach were recognised within the 2011 Strategic Policies SA Report.
- 10.4.2 The Partial Review is set to make a number of changes to Policy SP6, and the supporting text; however, these generally reflect a need to report the latest Central Government and London-specific policy context (rather than reflecting a shift in policy approach on the Council's part).
- 10.4.3 More generally, the Partial Review is set to largely reinforce the adopted spatial strategy of ensuring that Croydon Town Centre is the major focus of development. Economies of scale will be achieved and/or there will be the opportunity to coordinate individual schemes so that new buildings are connected to a district heating network fed by a combined heat and power station. Economies of scale should also increase the potential for schemes to achieve standards of sustainable design and construction that exceed requirements. The new emphasis on 'sustainable growth of the suburbs' is not thought likely to have a significant bearing in this respect.

Development management policy

- 10.4.4 Policy DM24 (Sustainable design and construction) has a dual focus on: A) mitigating the causes and effects of air, noise, and dust pollution and vibration; and B) requiring all major development proposals seek to reduce carbon dioxide emissions by at least 20 per cent through the use of on-site renewable energy generation. It is also noted that the supporting text to the policy refers to wider issues relevant to these objectives. It states that "Solid wall insulation will also be encouraged in existing developments where planning permission may be required"; if implemented this could significantly reduce heating requirements of the insulated buildings and thus carbon emissions from heating systems. It is recommended that the Council consider including this as part of the policy wording, otherwise it will have very limited weight in decision making.
- 10.4.5 With respect to the climate change adaptation objective, research has demonstrated that green space (particularly trees) can help to moderate peak temperatures on urban areas, helping to mitigate the impact of higher temperatures that are projected as a consequence of ongoing climate change. Policy DM26 (Sustainable Drainage Systems and Reducing Flood Risk) provides for multifunctional spaces and sustainable design. This could and should include the planning of trees as this would have both a cooling effect and reduce surface water runoff. Policy DM27 (Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces) and the two other 'Green Grid' policies should therefore contribute to the borough's resilience to climate change. The link could be made more explicit, however.

¹⁴ 55 residential units or 1,000 m² commercial development per hectare

Place and site specific proposals

10.4.6 The criteria-based, GIS analysis of site options (see discussion in 9.1.6) did not serve to highlight any issues/impacts in terms of ‘energy consumption’ objectives.

The emerging preferred approach as a whole

10.4.7 The intention is to reinforce the adopted strategy of concentrating growth within the Croydon Opportunity Area, which should help to ensure that opportunities to design in low carbon energy infrastructure are realised; however, it is not clear that the plan - at least through development management policy, which primarily defaults to London Plan policy - is going as far as it might to ensure that opportunities are realised. It is potentially appropriate to avoid setting overly restrictive policy at this stage (given the uncertainties that exist); however, this does highlight the need for careful monitoring (and in this respect it is noted that the Council will commit to monitoring % of major developments incorporating a site wide communal heating system and network connection).

10.5 Biodiversity, flora and fauna

Sustainability objectives are to -

- Conserve and enhance biodiversity and the quality of the environment, including incorporating features into development such as green roofs and an appropriate range of outdoor spaces in developments
- Increase quality and range of wildlife habitats in the borough
- Increase tree cover

Strategic Policies Partial Review

10.5.1 The 2011 Strategic Policies SA Report predicted that the spatial strategy would lead to positive effects on the basis that policy *“does not identify any proposed growth within areas of greenspace and the supporting text of the policy seeks to ensure brownfield land is always considered for development in the first instance.”* The report also concluded that: *“A large number of policies seek to provide protection or enhancement of open space and biodiversity. For example while specific protection is given to designated sites, policies also encourage the extension and enhancement of the Green Grid and the establishment of Urban Blue Corridors....”*

10.5.2 The ‘Green Grid’ policy was a particular focus of the 2011 appraisal, with the report stating that: *“The policy seeks to enhance access to the Green Grid for all and maximise opportunities for connectivity across the borough, but particularly in areas which are currently deficient in access to nature / and or have restricted access to public recreational space and play areas... High quality green spaces also go a long way to encouraging people to pursue healthier lifestyles through exercise such as walking, cycling and active children’s play.”*

10.5.3 The Partial Review does not set out to alter any biodiversity related policies, and it is unlikely to be the case that the minor shift in spatial strategy reflected in the Partial Review will have implications for biodiversity. Whilst the Croydon Policies Map is set to be updated to show c.83 new ‘Local Green Spaces’ this matter is dealt with through CLP2 (see discussion below).

Development management policy

10.5.4 Policy DM28 (Biodiversity) seeks to achieve protection and enhancement of biodiversity, and should contribute to all three sustainability objectives listed above. There is a focus on protecting and enhancing the borough’s woodlands, trees (particularly preserved trees and trees that make a contribution to the character of the area) and hedgerows. The policy also seeks to improve access to nature by setting out a series of requirements for development proposals, including a requirement to incorporate biodiversity within/on buildings and on development sites.

- 10.5.5 Policy DM2 (Development on garden land) is also notable, recognising that poorly planned piecemeal development of garden land in the past has adversely impacted on local biodiversity. The policy permits new dwellings or other development within the curtilage or garden of an existing dwelling or the redevelopment of existing dwellings and their curtilage or gardens where, amongst other things, character is protected; however, biodiversity is not referenced.
- 10.5.6 Policy DM26 (Sustainable Drainage Systems and Reducing Flood Risk) supports swales, green roofs and balancing ponds, which can provide significant biodiversity benefits; however the scope to incorporate such measures (with the exception of green roofs) on dense urban sites may be limited.
- 10.5.7 Finally, it is important to note the criteria that have informed the identification of Local Green Spaces for designation under DM27 (Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces). Sites have been designated where at least three of the following criteria are met, or where the site is publically accessible and at least one of the criteria is met:
- a) Historic Park or Garden;
 - b) Community garden;
 - c) Children's play area;
 - d) Tranquil area;
 - e) Natural and semi-natural open space;
 - f) Cemetery, church yard or burial ground;
 - g) Site of Nature Conservation Importance; or
 - h) Playing field or recreation ground.

Place and site specific proposals

- 10.5.8 It is helpful to consider the location of proposed site allocations in relation to areas designated as being of biodiversity importance.
- 10.5.9 Analysis of reasonable site options in 2015 identified that:
- Eight site options are within 400m of a site of special scientific interest (SSSI); however, only one of these is a preferred site (and this site in Coulsdon is located 350m from a SSSI, and hence unlikely to lead to issues). The other seven sites are all located outside the urban area, in Coulsdon, Kenley and Old Coulsdon and Sanderstead.
 - 47 site options are adjacent to a site of importance for nature conservation (SNCI), and another 18 are within close proximity (50m). Of the 47 adjacent sites 23% are preferred sites, and another five preferred sites are in close proximity.
 - 14 site options are adjacent to an area of ancient semi-natural woodland (ASNW); however, only two of these are preferred sites. The majority of the 14 site options are located in Addington (six sites), Sanderstead (four sites) and Selsdon (three sites).
 - 34 site options intersect an area of woodland; however, only 18% are preferred sites. One of the preferred sites (site 764, which is proposed for a school use) stands out as it is comprised of 29% woodland. Six non-preferred sites are comprised of over 33% woodland, and it is noted that five of these are within the urban area.

- 21 site options benefit from being within 400m of a local nature reserve; however, only four of these are preferred sites. Ten site options in Selsdon are located within close proximity to a LNR, but none of these are preferred sites (most being within the Green Belt).
- Four site options are adjacent to common land¹⁵ (all within Kenley and Old Coulsdon); however, none are preferred sites. Notably, 85% of non-preferred Site 826 is registered common land.

The emerging preferred approach as a whole

10.5.10 Supporting an increase in the rate of housing growth within the borough could potentially have implications for biodiversity related objectives; however, this is uncertain. Analysis of the preferred site allocations shows that they tend to perform well (relative to non-preferred sites) in terms of the need to avoid development in locations where there is the potential for impacts to sites designated as being sensitive from a biodiversity perspective (although the preferred approach does not perform as well in terms of the objective to locate development in areas where there is good access to the natural environment). It is also noted that strict development management policy is set to be put in place to ensure the protection of urban green space (including garden land) and support the Green Grid. Application of development management policy could potentially lead to positive effects on the biodiversity baseline; however, this is uncertain.

10.6 Water use

Sustainability objectives are to -

- Encourage more efficient use of water
- Adaptation and resilience to climate change and higher population

Strategic Policies Partial Review

10.6.1 The 2011 Strategic Policies SA Report predicted that the spatial strategy would lead to positive effects on the basis that policy would lead to *“growth which will lead to an increase in demand for water supply. However, the utility companies have not raised any concerns regarding possible water resources in their representations on the IDP and Core Strategy up to the Proposed Submission Stage. Where developments which put pressure on water resources were to go ahead, this issue will need to be covered in further detail by planning and the Environmental Impact Assessment (EIA) Regulations.”*

10.6.2 It is not anticipated that the increased quantum of growth supported through the Partial Review will lead to problems in terms of water supply, waste water management or the management of water resources / water quality more generally; however, plans will be scrutinised by the Environment Agency, infrastructure providers and other stakeholders through the current consultation. Account will need to be taken of the anticipated effects of climate change.

10.6.3 With regards to the efficiency of water use, the Partial Review is set to add a reference within Policy SP6 (Environment and Climate Change) to *“Requiring all new-build residential development to meet a minimum water efficiency standard of 110 litres/person/day.”* This is in-line with Government’s Housing Standards Review, which permits LPAs to set an optional water efficiency target of 110 l/p/d where this can be supported by evidence).¹⁶ It is noted that the policy approach is in line with Building Regulations.

¹⁵ Registered common land is land owned by one or more where other people, known as ‘commoners’, are entitled to use the land or take resources from it. There are various legal restrictions on what activities can be undertaken on common land.

¹⁶ <http://www.planningportal.gov.uk/buildingregulations/approveddocuments/part9/approved>

Development management policy

10.6.4 The DM policies are not set to include an explicit focus on water efficiency / the need to conserve water resources in a changing climate (although see related discussions below, under the ‘Drainage, flooding and water quality’) heading.

Place and site specific proposals

10.6.5 The criteria-based, GIS analysis of site options (see discussion in 9.1.6) did not serve to highlight any issues/impacts in terms of ‘water use’ objectives.

The emerging preferred approach as a whole

10.6.6 It is not necessarily the case that support for an increased scale of growth leads to implications in terms of placing additional strain on already stretched water resources. This is on the basis that Croydon is not thought to be any more ‘water stressed’ than other locations in London or the South East, and it is fair to assume that if housing need is not met in Croydon then it will have to be met elsewhere in the region. With regards to supporting efficiency of water use, the Strategic Policies Partial Review is set to implement a new policy; however, the ambition of the policy is necessarily limited. In general, the intention is to support sustainable design and construction measures in-line with London Plan policy.

10.7 Drainage, flooding and water quality

Sustainability objectives are to -

- Reduce pollution to water
- Reduce flood risk in vulnerable communities
- Steer vulnerable development away from areas affected by flooding
- Adaptation and resilience to climate change

Strategic Policies Partial Review

10.7.1 Flood risk is an issue within the Croydon Opportunity Area and many of the district and local centres; hence the 2011 Strategic Policies SA Report noted some uncertainty in relation to effects of the spatial strategy on flood risk. However, it also explained how the preferred approach had been improved iteratively over time, with inputs from the SA. It also found Policy SP6 (Climate Change) to perform on the basis of its clear support for Sustainable Drainage Systems (SuDS) and policy commitment to a partnership approach (with the Environment Agency, community groups, water and highways infrastructure providers, developers and other Lead Local Flood Authorities) to guard against inappropriate development within flood zones.

10.7.2 The Partial Review reflects a minor shift in spatial strategy (reduced emphasis on Coulsdon and increased emphasis on sustainable growth of the suburbs); however, it is not thought likely that this in itself has implications for flood risk. Neither is it the case that the Partial Review is set to reflect a notable shift in policy approach to flood risk management. There is, however, a notable added reference in Policy SP6 to the need to apply the Sequential Test and Exception Test ‘where required’, which equates to a commitment to apply it when determining planning applications at windfall sites (as opposed to at sites allocated through CLP2). Useful supporting text has been added to clarify the importance of flood risk as an issue, drawing on the 2015 Strategic Flood Risk Assessment (SFRA), and (perhaps more notably) there is added guidance on the application of SuDS. Text is now clear that even development in low flood risk areas must utilise SuDS (in view of the fact that surface water from one area of a catchment may contribute towards enhanced flood risk in another area of that catchment); and that the Level 2 SFRA and SWMP can be used to guide which SUDs will be the most suitable based on site specific considerations.

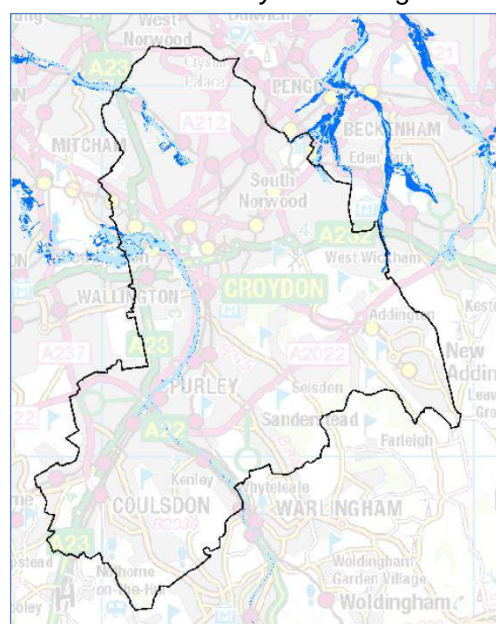
Development management policy

10.7.3 Policy DM26 (Sustainable drainage systems and reducing flood risk) should have a significant, direct positive effect on reducing flood risk (by translating NPPF and Planning Practice Guidance wording into local planning policy), including in vulnerable communities, and should also help to reduce water pollution by requiring the incorporation of SuDS in all development (such measures can help to cleanse rainwater runoff, for example by filtering out particulates). The policy states that all development should include SuDS and should achieve less than greenfield run off rate. This is an ambitious target that may not be feasible or viable to meet on some schemes, for example schemes with little or no outside space within the site boundary. The Council may want to consider rewording the policy to ensure that it is sufficiently flexible.

Place and site specific proposals

10.7.4 It is helpful to consider the location of proposed site allocations in relation to areas of flood risk. The main risks of fluvial flooding are in the vicinity of the Norbury Brook through Thornton Heath and Norbury and through Kenley, Purley and Waddon along the Brighton Road and Godstone Road valleys and around the culverted River Wandle. The area of chief concern for surface water flooding within the borough is that covered by the following three critical drainage areas (CDAs): Purley Cross, Brighton Road and South/Central Croydon. These CDAs delineate the pathway of a former river channel for a tributary of the River Wandle. During heavy rainfall, surface water follows its natural course along the A23 Brighton Road towards the Purley Cross Junction, resulting in flooding to significant depths.

Flood risk across Croydon Borough



10.7.5 Analysis of reasonable site options in 2015 identified that:

- Overall, 27 site options intersect with Flood Zone 2 (dark blue in Figure 6.2), of which 24 also intersect Flood Zone 3 (light blue in Figure 6.2), i.e. the zone of highest risk. 41% are preferred sites, of which five are in Purley, four are in Waddon, three are in Broad Green and Selhurst, one is in Croydon and one is in South Croydon. At eight of these preferred sites over 50% of the site is at risk of flooding, and in four instances over 90% of the site.

The emerging preferred approach as a whole

10.7.6 Croydon suffers from significant flood risk, having been ranked the fourth most susceptible authority in the country. On this basis, the decision to increase the rate of housing growth in the urban area (where flood risk is focused) does lead to some concerns, and it is appropriate to highlight the potential for significant negative effects. However, it is recognised that flood risk will be mitigated to a large extent through design measures - most notably by ensuring that residential uses are not located on the ground floor. Furthermore, it is understood that work is ongoing to explore flood risk in more detail, and that this work may yet have an influence on site allocations. Specifically, a Strategic Flood Risk Assessment (SFRA) is currently underway, which is applying a 'sequential test' to all proposed site options, with a view to ensuring that sites at risk of flooding are only allocated where absolutely necessary.

10.8 Air quality

Sustainability objectives are to -

- Reduce emissions of pollutants to air
- Reduce greenhouse gas emissions

Strategic Policies Partial Review

10.8.1 The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *“Negative impacts were recorded against SA Objective 16 : To protect and improve air quality’. Negative impacts were identified due to the policies promotion of increasing housing stock, which could lead to an increase in travel and congestion. However, Policies SP8 (Transport and Communication) and SP1 (The Places of Croydon) outline that new housing development will be directed and concentrated in areas highly accessible by walking and cycling and with high public transport accessibility levels or within areas where sustainable transport infrastructure can be improved. This will help mitigate predicted negative effects.”*

10.8.2 Through the Partial Review there will be minor amendments to the spatial strategy, and the implications for transport and traffic are discussed above under the ‘Transport’ heading. Notably, the effect of an increased emphasis on ‘sustainable growth at the suburbs’ could be to worsen the performance of the plan in terms of supporting a shift away from car dependency, at least in the short term (i.e. until public transport infrastructure upgrades can be implemented). There could be negative implications for air quality; however, it is noted that there are other factors - e.g. the increased use of electric vehicles - that will contribute to improved air quality.

Development management policy

10.8.3 Policy DM24 (Sustainable design and construction) focuses on mitigating the causes and effects of air pollution as well as other forms of pollution, thus it should have a positive effect on these objectives relative to a baseline of no policy. The supporting text states that developers should consider measures to minimise emissions of air pollution at the design stage and should incorporate best practice in the design, construction and operation of the development. Where a development has a negative impact on air quality, developers should identify mitigation measures that will minimise or offset the emissions from the development (e.g. enhanced energy efficiency; renewable energy generation; measures that promote walking and/or cycling). Developers or architects involved in new residential development, new industrial and commercial development, or mixed use development with housing are advised to consult Croydon’s Interim Planning Guidance on Improving Local Air Quality and the Mayor of London’s Control of Dust and Emissions Supplementary Planning Guidance.

10.8.4 Policy DM30 (Promoting sustainable travel and reducing congestion) requires new development to promote measures to increase the use of public transport, cycling and walking and to avoid a “severe impact” on traffic congestion. Congestion and use of private transport are associated with significant emissions of pollutants to the air, hence this policy should have a positive effect on improving air quality and reducing greenhouse gas emissions.

Place and site specific proposals

10.8.5 The criteria-based, GIS analysis of site options (see discussion in 9.1.6) did not serve to highlight any issues/impacts in terms of ‘air quality’ objectives.

The emerging preferred approach as a whole

- 10.8.6 The entire borough is designated as an Air Quality Management Area (AQMA), and hence this is potentially an argument against increasing the population within the borough, and the density of housing development within the urban area; however, air quality problems are fairly widespread in London and it is not clear that restricting growth in Croydon (with a resulting need for higher growth elsewhere nearby) would be a preferable option. The strategy of reaffirming the adopted Strategic Policies commitment to concentrating growth in the Croydon Opportunity Area is a positive (see discussion above under 'Transport) and the proposed increased emphasis on sustainable growth of the suburbs does not lead to major concerns.

10.9 Waste

Sustainability objectives are to -

- Promote waste minimisation, recycling and composting
- Reduce greenhouse gas emissions from waste
- Increase amount of energy generated from waste

Strategic Policies Partial Review

- 10.9.1 The 2011 Strategic Policies SA Report noted that redevelopment and growth will lead to increased waste generation locally; however, it did not give any reason to suggest that there will be any problems with regards to sustainable waste management (i.e. management of waste 'up the waste hierarchy' with a focus on reuse, recycling and recovery of energy from waste). The Partial Review will not lead to implications for good waste management.

Development management policy

- 10.9.2 Policy DM14 (Refuse and recycling) is the key policy on this issue. It sets out requirements for the provision of refuse and recycling facilities within developments. Notably, the supporting text states that: *"The Council considers the layout, siting, function and design of recycling and refuse storage facilities to be of equal importance. It is important that these facilities are considered as an integral part of the development process."*
- 10.9.3 No policies refer to energy from waste, therefore the current plan would have no effect on the objective of increasing the amount of energy generated from waste. However it is noted that the South London Waste Plan (which covers Croydon and forms part of Croydon's Local Plan) includes a policy on 'sustainable energy recovery' setting out requirements for energy from waste projects. Given the existence of this policy the lack of a DM policy would seem justified, assuming a more detailed policy is not required.

Place and site specific proposals

- 10.9.4 The criteria-based, GIS analysis of site options (see discussion in 9.1.6) did not serve to highlight any issues/impacts in terms of 'waste' objectives.

The emerging preferred approach as a whole

- 10.9.5 Suitable policy is set to be put in place to ensure good waste management, but the development management stage of decision-making is set to be more important for the achievement of sustainability objectives relating to good waste management. This is appropriate, given the need to avoid being overly restrictive through high-level policy.

10.10 Noise

Sustainability objectives are to -

- Reduce noise pollution, including reducing the adverse impacts of noise from traffic, freight, servicing, construction and demolition

Strategic Policies Partial Review

10.10.1 The 2011 Strategic Policies SA Report noted that: *“There is a focus within the Core Strategy policies on the need to locate new development near existing centres and in locations accessible by public transport, walking and cycling. However, new development implied by the Core Strategy (including new housing, employment development, new community facilities and educational development) is likely to cumulatively generate some new traffic, increase the number of journeys in the borough and associated congestion, increase noise pollution, increase air pollution and increase CO2 emissions” [emphasis added].*

10.10.2 The implications of the Partial Review for traffic congestion are discussed above, under the ‘Transport’ and ‘Air quality’ headings. Whilst there might potentially be some negative implications, it is not possible to conclude any potential for these to translate into increased noise pollution. This is on the basis that any increase in traffic will not necessarily impact on sensitive noise receptors (as opposed to the situation for air quality, given that the entire borough is designated as an Air Quality Management Area). Also, it is noted that most planning applications received by the Council are assessed for the impact of environmental noise on the new development. This to ensure that the proposed development has adequate sound insulation in order to minimise the adverse impact of noise from a railway or a busy road, aircraft or an industrial activity. Residential developments close to railways and other noise sensitive sites will need a noise assessment.

10.10.3 There is perhaps also a need to consider that the increased quantum of growth supported through the Partial Review will lead to increased problems associated with environmental disturbance during the construction of major developments; however, it is not clear that Croydon is particularly sensitive or susceptible in this respect. It is noted that the Council’s Code of Practice has been prepared to help developers and their contractors ensure that they undertake their works in the most considerate manner, in order to reduce the impact of the work on local communities. It also provides guidance on a Construction Logistic Plan required for major developments and the assessment of traffic movements.

Development management policy

10.10.4 Policy DM24 (Sustainable design and construction) focuses on mitigating the causes and effects of noise pollution as well as other forms of pollution. The supporting text highlights the issue of noise from construction and the application of the Council’s Code of Practice to help developers and their contractors to ensure that they undertake their works in the most considerate manner, in order to reduce the impact of the work on local communities. Other policies also relate to control of noise, amongst other factors, though this is generally only clarified in the supporting text. These policies include DM2 (Development on garden land), DM11 (Design and character) and DM14 (Refuse and recycling).

Place and site specific proposals

10.10.5 The criteria-based, GIS analysis of site options (see discussion in 9.1.6) did not serve to highlight any issues/impacts in terms of ‘noise’ objectives.

The emerging preferred approach as a whole

10.10.6 Implications for traffic congestion are discussed above, under the ‘Transport’ and ‘Air quality’ headings. Whilst there might potentially be some negative implications, it is not possible to conclude any potential for these to translate into increased noise pollution. It should be possible to suitably avoid and mitigate noise pollution through development management.

10.11 Conservation of the built environment

Sustainability objectives are to -

- Maintain and enhance the historic environment
- Bring forward investment in the historic environment for regeneration, reuse and adaptation
- Use heritage assets to provide educational opportunities and combat social exclusion

Strategic Policies Partial Review

- 10.11.1 The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *“Although not significant effects, new housing provision within the Opportunity Area would enhance the image of area... [and] improve the current dated townscape which suffers with poor urban design and architecture, beneficial effects were therefore recorded against SA Objective: To retain, conserve and enhance the valued townscape and landscape features.”* However, the report did highlight some spatial strategy related tensions, most notably: *“The location of the Enterprise Centre within Crystal Palace and upper Norwood should be mindful of its proposed location within a Conservation Area.”*
- 10.11.2 The report also concluded that: *“Across the policies, there is an emphasis on improving the public realm, by ensuring high quality design, location of development and requiring sufficient open space and amenity. Cumulatively this will result in improved townscapes and public realm across the borough and will in particular improve Croydon Opportunity Area as it currently suffers with a reputation of having a dated townscape with poor urban design and architecture.”*
- 10.11.3 Policy SP4 (Urban Design and Local Character) supports the creation of places that are well designed, safe, accessible, inclusive and enrich the quality of life for all those who live in, work in and visit the borough. It provides policy on urban design, local character and public realm; and also designates local views, Croydon Panoramas and Local Designated Landmarks so that partners might work together to protect and enhance these assets. The effect of the Partial Review will be to amend the number and extent of these designations on the Policies Map (with only three Locally Designated Views set to be de-designated entirely), but this does not reflect a policy shift (rather, changes reflect the latest evidence / situation on the ground).
- 10.11.4 Perhaps more notably, the Partial Review is set to de-designate Local Areas of Special Character and instead designate Local Heritage Areas (LHAs). LHAs are defined as *“distinctive locally significant heritage assets that have been designated as a result of their heritage and architectural or townscape or landscape value. LHAs are characterised by their locally recognised distinctive and particularly high quality examples of more familiar types of local historic development. LHAs are intended to “form a more robust basis for the protection and enhancement of the borough’s character and heritage.”*
- 10.11.5 Finally, there is a need to note the possible implications of an increased emphasis, through the Partial Review, on ‘sustainable growth of the suburbs’, with a vision statement now making reference to ‘intensify’ as well as ‘respectfully enhance’ the richness of character of Croydon’s suburbs. Elsewhere, the supporting text to SP2 (Homes) is now set to reference the need to manage *“sustainable growth of the suburbs to accommodate homes to contribute to the borough’s housing need and vitality and viability of centres, whilst not undermining the borough’s valued character and heritage.”*

Development management policy

- 10.11.6 Policy DM19 (Heritage assets and conservation) is the key policy and will have a significant positive effect on heritage related sustainability objectives. It will set out clear requirements to ensure that the character, appearance and setting of heritage assets within the borough is preserved and enhanced. Under the policy, historic buildings should be maintained in their original use wherever possible unless fully justified by demonstration that this is necessary to secure its long term future viability; and where a proposed change of use is fully justified, it should be demonstrated how the building's original fabric and character is to be preserved. The policy also recognises that: *"[i]n addition to the collective value of buildings and their relationship to each other, the character of conservation areas and Local Heritage Areas (LHA) may be defined by the wider townscape, land uses, public realm, open spaces, road layout or landscaped areas. This character can be relatively consistent or in larger areas may contain several 'character areas' within the conservation area or LHA. In addition to protecting individual buildings the Council will ensure that the wider character of an area is protected and enhanced."*
- 10.11.7 Policy DM11 (Design and character) should also contribute positively through its requirements to respect and enhance local character; to seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; and to support proposals that restore and incorporate historic street furniture within the development. More generally, the policy provides detailed guidance on scale, density massing, height, landscape, layout, materials and access. These are all factors that are important from a perspective of wishing to ensure conservation of townscape and heritage, recognising that there are existing problems, e.g. in relation to the conversion of houses into flats, and houses in multiple occupation.
- 10.11.8 Furthermore, Policy DM12 seeks to retain and incorporate historic shop fronts into residential conversion, recognising that *"[k]ey features such as large windows, details and proportions of the shop front can make for unique, adaptable and attractive home that enhance and compliment the character of the local area."*; Policy DM13 (Advertisement hoardings) seeks to restrict advertising in areas of historic character; and Policy DM18 seeks to ensure that tall or large buildings respect and enhance the local character, and do not harm the setting of heritage assets.
- 10.11.9 To some extent it could be argued that DM21 (Crystal Palace Football Club) makes a positive contribution to the character of the area, having been home to the football club SNCle 1924. These cultural benefits are recognised within the policy.

Place and site specific proposals

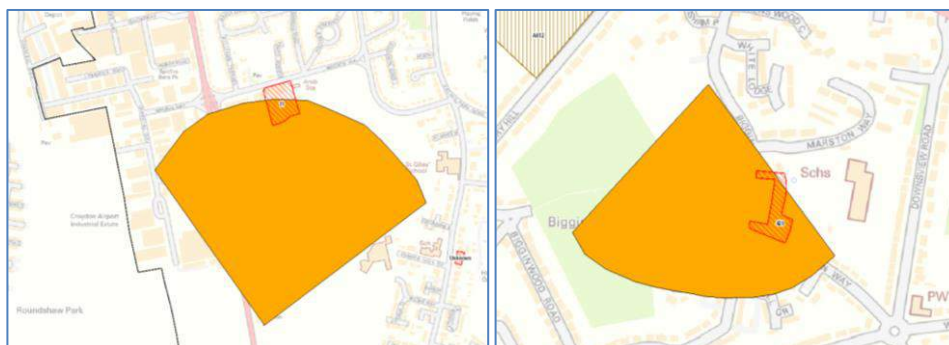
- 10.11.10 Analysis of reasonable site options in 2015 identified that:
- 29 site options intersect with a conservation area (CA), with 20 of those being located entirely within a CA. Of those 29 site intersecting a CA, 48% are preferred sites (with most of these being located in wither the Croydon Opportunity Area or the Crystal Palace & Upper Norwood area). Of the 20 sites entirely within a CA, ten (50%) are preferred sites.
 - Four site options intersect a nationally listed building, and another nine are within 20m (and thereby have the potential to impact on setting). Two that intersect are preferred sites, whilst six of those within 20m are preferred sites. In one of the instances of a preferred site intersecting, the proposed use is a school.
 - 43 site options intersect a locally listed building, and another 40 are within 20m. 60% that intersect are preferred sites, whilst 28 (70%) of those within 20m are preferred sites.

- Other heritage assets are; registered (statutory listed) historic parks and garden, locally listed historic parks and gardens and scheduled monuments.
 - Only two sites (Sites 460 and 612) are close to a registered park or garden (Norwood Grove Recreation Ground, partly located also in the London Borough of Lambeth). Both are non-preferred sites.
 - Two site options intersect a locally listed historic park or garden, and another 31 are within 20m. Both of the sites intersecting are non-preferred, whilst 12 (39%) of the sites that are adjacent (or virtually adjacent) are preferred.
 - Three sites lie within 20m of a scheduled monument, with one of these (Site 372) being a preferred site (proposed mixed use) directly adjacent to a scheduled monument.

10.11.11 It is also noted that two site options intersect significantly with a local area of special character, neither of which is a preferred site. These sites are in Purley and Norbury.

10.11.12 Also, five site options intersect with a ‘Croydon Panorama’. Of these, two are preferred. Site 11 lies in Croydon Panorama 8 (from Purley Way) while site 420 lies in Croydon Panorama 2 (from Biggin Hill).¹⁷ Site 11 is proposed for secondary school use, while Site 420 is proposed for residential development. Development of these sites for the proposed use will need to take into account the values of the relevant Croydon Panoramas.

Preferred site options intersecting a designated ‘Croydon panorama’



10.11.13 Finally, it is noted that two site options are within 50m of a Croydon landmark, both of which are preferred. Notably, site 194 is 25m from the Clocktower on Katharine Street.

The emerging preferred approach as a whole

10.11.14 The proposed increase in the rate of growth in the urban area, and also the proposed increased emphasis on sustainable growth of the suburbs, potentially leads to some tensions with built environment and heritage objectives; however, the proposed allocations tend to be in locations where there appears little potential to impact on designated assets (at least nationally designated assets; it is noted that 26 preferred sites intersect with a locally listed building). With the development management policy in place there will be good potential to work with Historic England to ensure that design measures avoid/mitigate negative effects and result in new development that reinforces existing historic built character where possible.

¹⁷ Croydon Council (date unknown) Appendix 6 – Proposed Local Designated Views, Croydon Panoramas and Landmarks [online] available at: <https://secure.croydon.gov.uk/akscroydon/images/att2673.pdf> (Accessed June 2015).

10.12 Materials

Sustainability objectives are to -

- Promote and increase use of building materials that have a low environmental impact

Strategic Policies Partial Review

10.12.1 As has already been discussed above, under the ‘Energy consumption’ heading, the Partial Review is set to amend sustainable design and construction requirements, but this is in response to changing national and regional policy context (as opposed to a policy shift on the Council’s part).

Development management policy

10.12.2 Policy DM11 (Design and character) requires that development proposals respect the appearance, *existing materials* and built and natural features of the surrounding area; it also states that proposals should demonstrate that *high quality durable materials* that respond to the local character are incorporated. Although the policy does not refer to the environmental impact of materials, the supporting text states that: “*When assessing proposed materials the Council will consider the quality, durability, attractiveness, sustainability, texture, colour and compatibility with existing buildings. [emphasis added].*” Similarly the supporting text to Policy DM12 (Shop front design) states that: “*The Council expects all shop front design to be of a high design quality and craftsmanship and whenever possible, use sustainable or recycled materials.*” If the Council wishes this objective to be fully reflected in decision making on applications, then it is recommended that such wording be incorporated into the policies themselves so that it can carry greater weight in decision making.

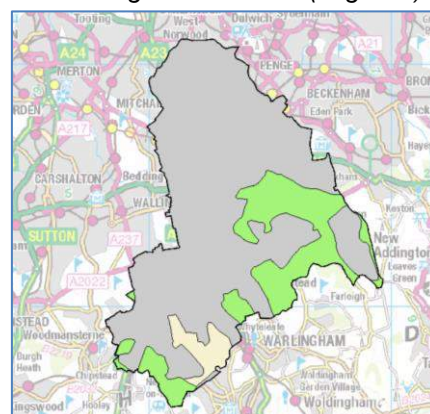
Place and site specific proposals

10.12.3 It is helpful to consider the location of proposed site allocations in relation to agricultural land, which although not really a ‘material asset’ can be considered under this heading. Most of the borough is urban, but there is a significant area of grade 3¹⁸ agricultural land.

10.12.4 Analysis of reasonable site options in 2015 identified that:

- 36 site options intersect agricultural land, of which 19% are preferred sites.¹⁹
- 14 of the 36 sites discussed above intersect with agricultural land that is entered into the Entry Level Environmental Stewardship scheme. Of these 14 sites, only 14% are preferred sites, both located in Coulsdon.

Grade 3 agricultural land (in green)



The emerging preferred approach as a whole

10.12.5 Sustainable design and construction measures are not a major focus of policy attention, as it is deemed generally appropriate to default to standards established through the London Plan. Loss of agricultural land can also be considered under this heading, and in this respect the plan performs well, although there is set to be some loss of ‘grade 3’ land.

¹⁸ Grade 3 land is considered to be ‘best and most versatile’, however, is of a lesser quality than grade 1 and grade 2 land.

¹⁹ The agricultural land dataset is poor resolution. It is likely that a number of these sites will not comprise agricultural land in practice.

10.13 Human health and wellbeing

Sustainability objectives are to -

- Improve mental and physical wellbeing
- Support for carers and those with long term conditions
- Facilitate fair and equal access for all members of the community, including health care, education and training, jobs, community and cultural facilities
- Ensure a better living environment with enriched urban spaces, places for people that are safe, active and promote healthy communities and are adaptable to changing needs

Strategic Policies Partial Review

- 10.13.1 The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *“Policy SP1 seeks to manage and direct growth to create a network of healthy places which will contribute to achieving [good health] as there is a strong relationship between levels of health deprivation in an area and the condition of the local environment. Policy SP1 may include the redevelopment of derelict sites or run-down areas in poor condition; and health can be benefited by a reduction in crime levels which may occur as a result of such regeneration. Existing poor environments can discourage people from walking to school or shops or taking exercise which can have adverse health effects, usually within particular demographic groups – children, the young and elderly. The least healthy’ 65 – 74 year olds are situated in the north or south east of the borough and include Broad Green, Selhurst, West Thornton, Thornton Heath, Fieldway, and New Addington where growth and moderate growth is proposed. In Broad Green a quarter of residents aged 65 to 74 report they are not in good health, therefore this policy could potentially benefit local residents.”*
- 10.13.2 However, in addition to these positive comments, the 2011 SA Report did also note some tensions. Specifically: *“The strategy will direct growth and intensification in areas of high accessibility (Centre and Environs). This would result in denser development, with potential negative effects in terms of health through overcrowding and stress on current infrastructure and services. However, accessibility of services may be improved with higher densities.”*
- 10.13.3 Strategic Policy SP8 (Green Grid) was also a focus of the 2011 appraisal, with the report stating that: *“The policy seeks to enhance access to the Green Grid for all and maximise opportunities for connectivity across the borough, but particularly in areas which are currently deficient in access to nature / and or have restricted access to public recreational space and play areas... High quality green spaces also go a long way to encouraging people to pursue healthier lifestyles through exercise such as walking, cycling and active children’s play. The loss of such areas could have significant adverse effects on health, particularly for more vulnerable demographic groups. The policy also seeks to ensure that existing and new open spaces are designed in an inclusive way, which will contribute in ensuring social inclusion and cohesion.”*
- 10.13.4 The Partial Review is set to have few direct implications for health and wellbeing; although there will be indirect effects as a result of the new policy approach to affordable housing. This matter is given further consideration below, under the ‘Housing’ heading. Also of note is the new policy support for Neighbourhood Centres, with the intention of ensuring that they play an enhanced role as community hubs. This could potentially lead to positive effects, particularly if health centres and associated facilities increasingly recognise Neighbourhood Centres as locations to deliver integrated health care.

Development management policy

- 10.13.5 Many of the policies within the plan will indirectly contribute to improved health and physical wellbeing, due to the multiple social and environmental determinants of health (e.g. housing, access to green space, air quality). Examples include the policies mentioned below, as well as policies such as Policy DM24 (Sustainable design and construction) which seeks to reduce to acceptable levels the negative effects of pollution on the health and safety of users of the site or surrounding land; and Policy DM25 (Land contamination) which requires site remediation and aftercare measures where a site investigation identifies risks to human health, adjacent land uses or the local environment.
- 10.13.6 Croydon has strategic objectives to ensure that high quality new development both integrates respects and enhances the borough's natural environment and built heritage, to create spaces and buildings that foster safe, healthy communities. Policy DM11 (Design and character) will have a positive effect on the objective of ensuring a better living environment by ensuring that development: enhances and sensitively responds to the predominant built form; creates clear, well defined and designed public and private spaces; and delivers high quality design including high quality amenity spaces.
- 10.13.7 Policy DM20 (Providing and protecting community facilities) will also play an important role. The intention is to positively support access to community facilities by protecting existing provision and supporting the provision of new community facilities where these meet specified criteria. The policy provides guidance on the marketing exercise that must be carried out prior to a conclusion being reached that an existing facility is not viable, and hence is suitable for a change to a more profitable (non-community) use.
- 10.13.8 Another important consideration relates to ensuring provision for residential care and nursing homes for the elderly. This matter is dealt with specifically by Policy DM3, which seeks to actively shape the care home market and manage supply. As things stand, Croydon experiences a range of challenges arising from the significant number of residential and nursing care home sited in the borough. These challenges include excess demand on a range of local health and social care services which is not reflected in national funding formulae for central Government funding towards local services.
- 10.13.9 Through DM21 (Crystal Palace Football Club), the Council has recognised the role that Crystal Palace Football Club has in the community, identifying it as a *“large scale community and leisure facility that continues to make a significant contribution to local area regeneration, creating opportunities for people to share a sense of pride in where they live, as well as delivering initiatives that support community cohesion and facilitate greater social inclusion.”* The protection of this asset should maintain the leisure use it offers and the opportunities for physical exercise that this presents.

Place and site specific proposals

- 10.13.10 It is helpful to consider the location of proposed site allocations in relation to open space. Parcels of designated open land are spread fairly evenly across the urban area. The vast majority are locally designated, but eight (larger) parcels are designated as Metropolitan Open Land (MOL). There is a need to consider the implications of both a site option on an existing area of open space (likely to be 'a negative'), and also the implications of a site option near to open space (likely to be 'a positive').
- 10.13.11 Analysis of reasonable site options in 2015 identified that:
- Nine site options intersect with Metropolitan Open Land (MOL), of which 66% are preferred sites. Five of these sites are located within Shirley. On the other hand, 20 site options benefit from being in close proximity to MOL, of which eight (40%) are preferred.

- Five site options intersect with local designated open land, of which 60% are preferred sites (one being proposed as for a school use - see Figure 6.10, below). On the other hand, 75 site options benefit from being in close proximity to local open land, of which 41 (55%) are preferred.
- It is also noted that, of the 24 preferred sites beyond 400m from locally designated open space, ten (42%) are within the Croydon Opportunity Area, six (25%) are within Broad Green & Selhurst and three (13%) are within Purley.
- Finally, it is noted that eight site options benefit from being within 1km of a country park, of which four (50%) are preferred. Seven of the eight site options are within South Norwood.

The emerging preferred approach as a whole

10.13.12 Given the adopted Strategic Policies, the current plans are set to have few direct implications for health and wellbeing; although there will be indirect effects as a result of the new policy approach to affordable housing (a matter given further consideration below, under the 'Housing' heading). Also of note is the new policy support for Neighbourhood Centres, with the intention of ensuring that they play an enhanced role as community hubs. The plans are generally supportive of efforts to address the determinants of good health, although it is noted that there is set to be some loss of Metropolitan Open Land (MOL).

10.14 Crime and safety

Sustainability objectives are to -

- Reduce anti-social activity, opportunities for crime and fear of crime

Strategic Policies Partial Review

- 10.14.1 The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *“Beneficial effects were also recorded against many of the social SA Objectives as directing growth to Croydon’s Metropolitan Centre and Places would contribute to improving pockets of deprivation through improving fear of crime (safety by design), improving housing standards, improving employment opportunities, education opportunities and accessibility opportunities . This would particularly benefit those in the most deprived ward of Fieldway. [emphasis added]”*
- 10.14.2 Elsewhere, the report stated that: *“Policies that seek to encourage new development, improve the public realm and the layout / clarity of development, encourage walking and provide community facilities are all likely to have a cumulative beneficial effect on crime and fear of crime. This would be achieved through increased surveillance, greater opportunities and activities for Croydon’s youth and improved access for all.”*
- 10.14.3 The Partial Review does have some implications for the urban realm (see discussion above, under 'Conservation of the built environment'), but any implications for crime and safety will be indirect and marginal.

Development management policy

- 10.14.4 Few DM policies, or sections of supporting text, in the plan explicitly refer to crime or fear of crime or related safety issues. Exceptions include Policy DM11 (Design and character), which requires residential amenity space to comply with Croydon’s Supplementary Planning Document No.3 ‘Designing for Community Safety’, which covers safety in layout and design (including key principles such as natural surveillance, sense of ownership, defensible space and physical protection). The supporting text also highlights: the provision of sufficient lighting, in line with EU lighting uniformity requirements, to encourage greater pedestrian access, movement and reduce opportunity for undesirable behaviour; the need for good management of communal amenity space, to increase the sense of safety in a neighbourhood; and the need for Design and Access Statements to refer to ‘By Design’ and SPD3 Designing for Community Safety. Implementation of this policy and, by extension, the requirements of SPD3, should have a positive impact on crime and fear of crime; however there are many factors influencing crime and fear of crime and many areas where significant new development will not occur, thus the effect is not considered to be significant.

Place and site specific proposals

- 10.14.5 The criteria-based, GIS analysis of site options (see discussion in 9.1.6) did not serve to highlight any issues/impacts in terms of ‘crime and safety’ objectives.

The emerging preferred approach as a whole

- 10.14.6 Broad strategy and development management policy does have some implications for the urban realm (see discussion above, under ‘Conservation of the built environment’), but any implications for crime and safety will be indirect and marginal.

10.15 Social inclusion and equality

Sustainability objectives are to -

- Create community identity and sense of place
- Promote adaptable, durable and inclusive developments

Strategic Policies Partial Review

- 10.15.1 The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: *“Beneficial effects were also recorded against many of the social SA Objectives as directing growth to Croydon’s Metropolitan Centre and Places would contribute to improving pockets of deprivation through improving fear of crime (safety by design), improving housing standards, improving employment opportunities, education opportunities and accessibility opportunities . This would particularly benefit those in the most deprived ward of Fieldway.”*
- 10.15.2 Elsewhere, the report stated that: *“Throughout the Core Strategy policies there is an emphasis on providing amenities and services in accessible locations and protecting those that already exist. Increased amenity provision is also recognised in a number of policies, and others seek to improve non-car infrastructure. Such factors are likely to have a positive cumulative impact, particularly on currently deprived communities.”*
- 10.15.3 However, the 2011 Strategic Policies SA Report highlighted a draw-back to Policy SP2 in that: *“The focus is very much on the Croydon Metropolitan Centre and centres along the A23, such that the development of deprived areas, such as Fieldway and Addington, were not given as much consideration.”*

- 10.15.4 The Partial Review is set to have few direct implications for social inclusion and equality; although there will be indirect effects as a result of the new policy approach to affordable housing. This matter is given further consideration below, under the 'Housing' heading. Also of note is the new policy support for Neighbourhood Centres, with the intention of ensuring that they play an enhanced role as community hubs. Neighbourhood Centres are particularly important to those who do not have access to a car, are unable to travel far or those with a disability.
- 10.15.5 Another consideration is the approach being taken to providing for the accommodation needs of Gypsies and Travellers; however, this matter is considered separately below, under the 'Housing' heading.

Development management policy

- 10.15.6 Policy DM11 (Design and character) builds on Strategic Policy SP4 by setting out detailed design principles. Similarly Policy DM15 will further contribute to the objective of creating community identity and a distinctive sense of place by promoting the provision of public art that responds to local character and *“reinforces a sense of place”* as part of development schemes.
- 10.15.7 There are fewer policy references to adaptable, durable and inclusive development in the plan, although Policy DM11 does require the provision of external spaces that are *“visually attractive, easily accessible and safe for all users”*. Paragraph 57 of the NPPF advises planning authorities to *“plan positively for the achievement of high quality and inclusive design”*. However the London Plan already provides some strong policies on inclusive design (e.g. on lifetime homes) so the limited treatment of this issue is understandable given that there is no need to repeat these policies here. There is also limited reference to durable and adaptable design, although policy DM20 does state that the council will support applications for community facilities that *“Include buildings which are flexible, adaptable, capable of multi-use and, where possible, enable future expansion”*. Policies in the London Plan do help to secure this objective, for example the policy requiring homes to meet Lifetime Homes standard (London Plan policy 3.9) will ensure there is significant flexibility designed in.
- 10.15.8 Policy DM22 (Protecting Public Houses) sets policy to ensure that proposals involving the loss of a public house undertake the necessary work to demonstrate that there is not a defined need for a public house, recognising that need can be demonstrated on the basis of a number of factors. This detailed policy approach - tailored to the context of public houses - is necessary given that public houses function differently to other community infrastructure assets. The policy essentially seeks to counter market forces which, if left to operate, would result in a tendency for public houses to be converted to housing.
- 10.15.9 Other matters of relevance to social inclusion and equality have already been discussed above, under the 'Health and wellbeing' heading, for example the implications of Policy DM20 (Providing and protecting community facilities). It is also worth noting here that community uses are supported through Policy DM32 (Temporary car parks), which states that: *“Cultural and creative industries and community uses are considered preferable to temporary car parks [at under used and vacant spaces] as they are likely to bring greater economic and regeneration benefits to the borough. Temporary car parks are also less likely to improve the character of an area or contribute to enhancing a sense of place.”*
- 10.15.10 Through DM21 (Crystal Palace Football Club), the Council has recognised the role that Crystal Palace Football Club has in the community, identifying it as a *“large scale community and leisure facility that continues to make a significant contribution to local area regeneration, creating opportunities for people to share a sense of pride in where they live, as well as delivering initiatives that support community cohesion and facilitate greater social inclusion.”* The protection of this asset should ensure that the social cohesion generated around the football club remains.

Place and site specific proposals

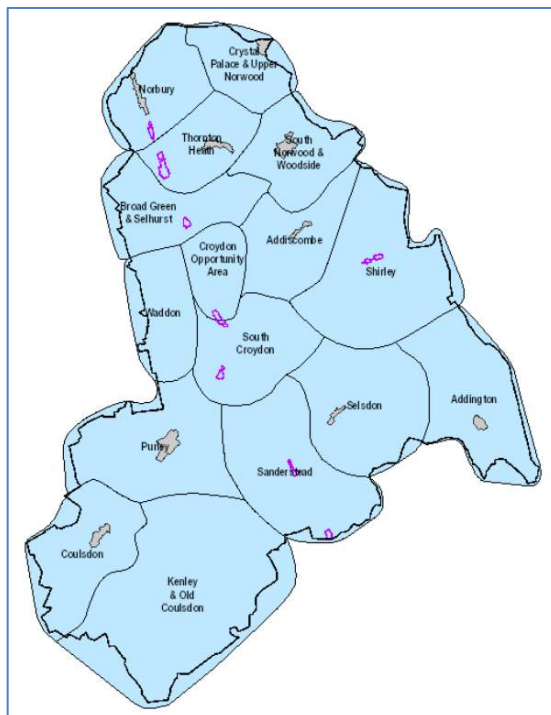
10.15.11 It is helpful to consider the location of proposed site allocations in relation to centres of retail and service provision; and also to consider the location of proposed site allocations in relation to areas of relative deprivation. Each of these matters is considered in turn below.

Proximity of sites to centres of retail and service provision

10.15.12 Analysis of reasonable site options in 2015 identified that:

- 147 site options are more than 800m from a local centre (discounting sites within the Croydon Opportunity Area). Of these, 41% are preferred sites. Of these preferred sites, 13 (21%) are in Purley, ten (16%) are in Waddon and six (10%) are in Broad Green & Selhurst.
- 128 site options are more than 800m from a district centre (discounting sites within the Croydon Opportunity Area). Of these, 40% are preferred sites. Of these preferred sites, 15 (29%) are in Broad Green & Selhurst and 12 (24%) are in Waddon.
- 82 site options are more than 800m from a primary shopping area. Of these, 33% are preferred sites. Of these preferred sites, nine (33%) are in Waddon and six (22%) are in Broad Green & Selhurst.
- 43 site options are more than 800m from a shopping parade. Of these, 33% are preferred sites. Of these preferred sites, four (29%) are in Purley and three (21%) are in Crystal Palace & Upper Norwood.

District and local centres



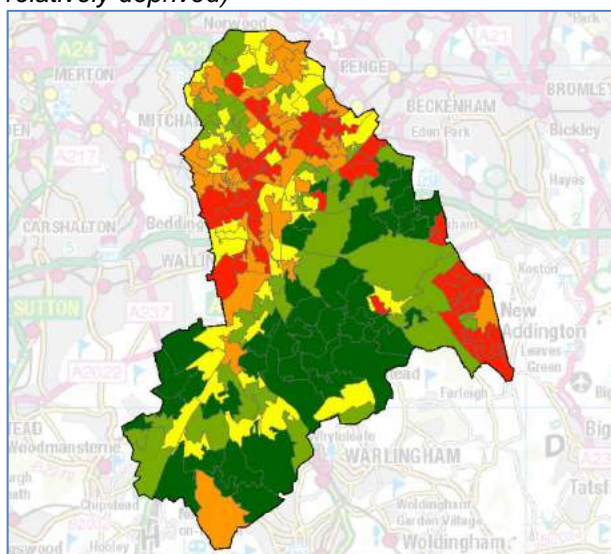
Proximity of sites to areas of relative deprivation

10.15.13 The 2010 Index of Multiple Deprivation (IMD) ranks Croydon as the 107th most deprived local authority in England, out of 326 local authorities nationally and the 19th most deprived London borough out of 32. Overall, Croydon has become more deprived between 2004 and 2010. As shown in Figure 6.8 (where red indicates higher levels of deprivation), the north of borough is generally more deprived than the south, sharing more of the characteristics of inner London than the south of the borough.

10.15.14 Analysis of reasonable site options in 2015 identified that:

- 61 site options intersect within an area that is amongst the 20% most 'overall deprived' within the borough (i.e. the red sites in the figure). Of these, 66% are preferred.
- 80 site options intersect within an area that is amongst the 20% most 'employment deprived' within the borough. Of these, 71% are preferred. 39 of the sites that are associated with a relatively deprived area are within the Croydon Opportunity Area, of which 34 (87%) are preferred.
- 57 site options intersect within an area that is amongst the 20% most 'health deprived' within the borough. Of these, 65% are preferred. 19 of the sites that are associated with a relatively deprived area are within Broad Green and Selhurst, of which 12 (63%) are preferred.

'Multiple deprivation' across the borough (red = relatively deprived)



The emerging preferred approach as a whole

10.15.15 The 2011 appraisal of the Strategic Policies highlighted that, whilst the broad growth strategy is set to support regeneration in many locations, there are other locations (e.g. Addington) where it is less clear that regeneration objectives will be realised. The proposal at the current time is to reduce the concentration of growth to a small extent, and so it should be the case that the effect is to ensure that more locations benefit from growth. A number of sites are set to be allocated in those parts of the borough, outside the Croydon Opportunity Area, that suffer from relative deprivation. This is a positive, and it will be important to seek to capitalise on regeneration opportunities through development management policy.

10.16 Housing

Sustainability objectives are to -

- Everyone should have the opportunity to live in a decent home
- Improve housing conditions and reduce homelessness
- Plan to meet the housing requirements of the whole community, and provide greater choice and an appropriate mix in the size, type and location of housing
- Promote adaptable, durable and inclusive developments

Strategic Policies Partial Review

- 10.16.1 The Partial Review seeks to make provision for the London Plan Housing Target - and also leaves open the possibility of exceeding this target - however, this is essentially a low housing growth strategy in that Objectively Assessed Housing Needs will not be met in full.
- 10.16.2 The Partial Review also seeks to make amendments to the Council's policy on affordable housing and 'mix of homes by size', as set out in Policy SP2. The headline changes are: 15% (rather than 10%) of all new homes in the borough developed over the plan period to be intermediate affordable housing for low cost shared home ownership managed by a Registered Social Landlord; and seeking a 60:40 ratio between affordable rented homes and intermediate (including starter) homes.
- 10.16.3 Another important change relates to the mix of affordable housing tenures that will be sought on qualifying schemes (with an increased emphasis on affordable or social rent housing, as opposed to intermediate low cost shared home ownership). This is an important step, as there is a limited current supply of social rented housing at only 18% of all households, relative to 24% for London as a whole) and there is significant homelessness. However, this emphasis is likely to have less effect given that the Proposed Submission CLP1.1 has proposed a revised ratio of 60:40 (from 75:25) in favour of affordable or social rent properties.
- 10.16.4 Finally, there is a need to consider the approach taken through the Partial Review for making provision for Gypsy and Traveller accommodation needs. There is a need for 49 new Gypsy and Traveller pitches (a pitch being space for one mobile home) in Croydon up to 2036; however, as only 79% of the need for bricks and mortar housing will be met in the borough, the Council has determined through the Partial Review that only a proportion of the need for Gypsy and Traveller pitches can be met.

Development management policy

- 10.16.5 Policy DM1 (Housing choice for sustainable communities) will protect existing supply, and secure new supply, of homes with three or more bedrooms. It builds on upon Policy SP2 by setting out the minimum requirements for sites in different settings with different levels of public transport accessibility. The need for homes for families in Croydon was identified in Croydon Strategic Housing Market Assessment (SHMA) 2015, which highlights that 50% of the future requirement for market housing is for larger homes.
- 10.16.6 Other DM policies might potentially be seen to be countering housing objectives - most notably DM22 (Public houses); however, there is no reason to suggest that effects would be significant, i.e. there should still be good potential to deliver housing to meet identified needs.
- 10.16.7 Regarding the objective to promote adaptable, durable and inclusive developments, please refer to the commentary under 'Social Inclusion and Equality' above.

Place and site specific proposals

- 10.16.8 It is appropriate here to focus on the matter of meeting the accommodation needs of the Gypsy and Traveller community. Points to note are as follows -
- The proposal is to allocate just one site - site 324 Purley Oaks Depot - which is a departure from the approach favoured in 2015, at the time of the Preferred and Alternative Options consultation. The change reflects the fact that other sites have proved to be not available/deliverable in the plan period.
 - The site benefits from good access to a District Centre; however, this can equally lead to a risk of tensions between communities. It is also noted that the site intersects (c.20 - 25%) with the identified flood risk zone.
 - As such, it is clear that there is benefit to ensuring a policy framework is in place to guide development of this site. Policy SP2 includes high-level policy focused on the selection of suitable Gypsy and Traveller sites, and a range of other development management policies will act to guide planning decisions on this site; however, there could be benefit to more detailed site-specific policy.

The emerging preferred approach as a whole

- 10.16.9 In total the proposal is to meet 73% of the need for homes and gypsy and traveller pitches in the borough. The remaining need will have to be met under the Duty to Co-operate by other boroughs in London and the wider South East. There are also some question-marks regarding the specific approach that is proposed in relation to Gypsy and Traveller accommodation, with the single proposed site allocation being associated with certain issues.
- 10.16.10 Finally, it is noted that important changes to affordable housing policy are set to be implemented, which are on the whole positive (recognising that viability constraints remain, e.g. mean that the ambition of meeting affordable housing needs in full, by delivering 91% of new housing as affordable, is entirely unrealistic).

10.17 Archaeological heritage

Sustainability objectives are to -

- Maintain and enhance the historic environment
- Facilitate fair and equal access for all members of the community to education and training
- Improve educational and training facilities within the Borough
- Increase in places for children’s education

Strategic Policies Partial Review

- 10.17.1 At present approximately a quarter of the borough is covered by Archaeological Priority Areas, which are areas that have a high likelihood of archaeological significance, and the Partial Review explains that the Council is currently working with Historic England to undertake a review of the borough’s Archaeological Priority Areas to align with Historic England’s (London) methodology and categorisation, which determines the likelihood of the presence of matters archaeological importance. The London Plan states that Boroughs should “include appropriate policies in their plan for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

Development management policy

- 10.17.2 Policy DM19 (Heritage assets and conservation) includes a requirement that: *“In consultation with the Greater London Archaeological Advisory Service, or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that*

affect, or have the potential to affect Croydon’s archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority”. This policy provides additional clarity to developers about the requirements relating to maintaining archaeological heritage.

Place and site specific proposals

10.17.3 It is helpful to query the location of sites in relation to the designated archaeological priority zones. Analysis of reasonable site options in 2015 identified that:

- 104 site options intersect significantly with an archaeological priority area. Of these, 66% are preferred. Development on these sites will require an archaeological assessment to be submitted to Historic England.

The emerging preferred approach as a whole

10.17.4 A large number of preferred site options intersect with a designated archaeological priority zone; however, it is not thought that this leads to any major concerns. Appropriate development management policy is set to be put in place to ensure that archaeological assets are given due consideration at the development management stage.

10.18 Education, skills and training

Sustainability objectives are to -

- Promote growth of creative industries and development of centralised hub to support creative businesses
- Support temporary use of vacant buildings and sites for creative/cultural activity
- Ensure that all communities have access to leisure and recreation facilities

Strategic Policies Partial Review

10.18.1 The 2011 Strategic Policies SA Report stated the following in relation to the spatial strategy: “Beneficial effects were also recorded against many of the social SA Objectives as directing growth to Croydon’s Metropolitan Centre and Places would contribute to improving pockets of deprivation through improving fear of crime (safety by design), improving housing standards, improving employment opportunities, education opportunities and accessibility opportunities . This would particularly benefit those in the most deprived ward of Fieldway. [emphasis added]” It also found Policy SP5 (Community Facilities and Education) to score positively against the SA Objectives due to the policy’s commitment to improving community facilities, including education, skills and training.

10.18.2 The Partial Review does not propose any changes to the Council’s strategy,

Development management policy

10.18.3 There are no DM policies relating directly to education provision, neither is there any reference to training or apprenticeships.

Place and site specific proposals

10.18.4 The criteria-based, GIS analysis of site options (see discussion in 9.1.6) did not serve to highlight any issues/impacts in terms of ‘education, skills and training’ objectives.

The emerging preferred approach as a whole

- 10.18.5 Education, skills and training is not set to be a focus of new policy, with adopted Strategic Policies deemed to remain fit for purpose. With regards to site allocations, it is noted that a number of sites for new schools are set to be allocated, which is a positive step; however, it is difficult to appraise this strategy in any detail. It is noted that in three instances the decision has been taken to accept school development within the Green Belt, which is an indication of the importance that is placed on the achievement of education objectives.

10.19 Culture, Sport & Recreation

Sustainability objectives are to -

- Promote growth of creative industries and development of centralised hub to support creative businesses
- Support temporary use of vacant buildings and sites for creative/cultural activity
- Ensure that all communities have access to leisure and recreation facilities

Strategic Policies Partial Review

- 10.19.1 One of the six headline priorities of Croydon’s Sustainable Community Strategy 2013-2018 is ‘A Creative City - a place noted for its culture and creativity - one of the best incubators of new artistic and sporting talent in the country’. The supporting text to SP3 (Employment) then goes on to discuss the challenge of providing the necessary facilities, identifying (amongst other things) the important role that can be played by temporary uses of vacant or underused sites. Adopted Policy SP3 itself states that the Council will support the temporary occupation of empty buildings and cleared sites by ‘creative industries and cultural organisations’ where they contribute to regeneration and enhance the character and vitality of the area; and the Partial Review consultation document proposes altering this slightly so as to refer to ‘creative industries, cultural organisations and other meanwhile uses’.

Development management policy

- 10.19.2 Policy DM8 seeks to designate and ensure that the vitality and viability of the borough’s Restaurant Quarters is maintained and increased and that they continue to serve local communities, thus preserving the cultural and leisure offer that such areas provide.
- 10.19.3 Policy DM32 (Temporary car parks) seeks to support growth of creative industries by stipulating that, for existing vacant spaces, permission will only be granted for temporary uses other than temporary car parks, with the supporting text explaining that, *“Cultural and creative industries and community uses are considered preferable to temporary car parks as they are likely to bring greater economic and regeneration benefits to the borough. Temporary car parks are also less likely to improve the character of an area or contribute to enhancing a sense of place.”*
- 10.19.4 There are few policy references to leisure and recreation facilities although Policy DM27 (Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces) states that extensions to existing buildings in Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces should not be more than 20% of their original floor space or volume, or 100m² (whichever is the smaller) unless they are for, amongst other uses, outdoor recreation. It is also noted that the supporting text to DM5 (Centres) states that: *“Community facilities falling within Main Retail Frontages, Secondary Retail Frontages, Shopping Parades or Restaurant Quarter Parades will not be safeguarded. However, the Frontage designations currently relating to Purley Leisure Centre, and The Phoenix Community Centre in Westow Street, SE19, have been removed in order that they remain protected community facilities”* [emphasis added].

- 10.19.5 Through DM21 (Crystal Palace Football Club), the Council has recognised the role that Crystal Palace Football Club has in the community, identifying it as a *“large scale community and leisure facility that continues to make a significant contribution to local area regeneration, creating opportunities for people to share a sense of pride in where they live, as well as delivering initiatives that support community cohesion and facilitate greater social inclusion.”* The protection of this asset should ensure that the leisure facilities remain presenting opportunities for sport and exercise
- Place and site specific proposals
- 10.19.6 The criteria-based, GIS analysis of site options (see discussion in 9.1.6) did not serve to highlight any issues/impacts in terms of ‘culture, sport and recreation’ objectives.
- The emerging preferred approach as a whole
- 10.19.7 Planning for a ‘creative city’ is an important consideration locally, and it would seem that the adopted Strategic Policies establish an ambitious policy approach. Only minor changes are proposed through policy at the current time.

PART 3: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

11 INTRODUCTION (TO PART 3)

11.1.1 This Part of the report explains next steps that will be taken as part of plan-making / SA.

12 PLAN FINALISATION

12.1.1 Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

12.1.2 If found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' must be published that sets out (amongst other things) *the measures decided concerning monitoring*.

13 MONITORING

13.1.1 The SA Report must present 'measures envisaged concerning monitoring'. In-light of the appraisal of the draft plan presented above, it is suggested that there might be a focus of monitoring effort on -

- Unemployment resulting from loss of jobs in the light industrial sector
- Measures to improve public transport accessibility in growth locations with currently poor PTAL
- Opportunities taken to exceed London Plan low carbon, decentralised energy targets and sustainable design and construction standards
- Impacts to specific sites of biodiversity importance that could potentially come under pressure as a result of site allocations
- Development of the Green Grid
- Development within the floodplain, recognising the potential for cumulative impacts
- Traffic congestion in air quality hotspots
- Heritage indicators developed in conjunction with Historic England
- Loss of open space, recognising the potential for cumulative effects
- Achievement of regeneration objectives (including in locations outside the Croydon Opportunity Area)
- Delivery of sites that meet the needs of the Gypsy and Traveller population.

APPENDIX I - REGULATORY REQUIREMENTS

As discussed in Chapter 2 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
			<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Questions answered by this SA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Whilst Tables A and B signpost broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see Table C.

Table C: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
	Chapter 3 ('What's the plan seeking to achieve') presents this information.
	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The Scoping Report was updated post consultation, and is available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', and this is presented within Chapter 4 ('What's the scope of the SA') in a slightly updated form.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Chapter 4 ('What's the scope of the SA').</p> <p>With regards to explaining "<i>how... considerations have been taken into account</i>" -</p> <ul style="list-style-type: none"> • Chapters 6 explains how reasonable alternatives were established in-light of earlier consultation/ SA. • Chapter 8 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).
f) The likely significant effects on the environment, including on issues such as... and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	<ul style="list-style-type: none"> • Chapter 7 presents alternatives appraisal findings (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/consultation). • Chapters 10 presents the Draft Plan appraisal. <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.</p>

<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>The 2015 appraisal of the Draft Plan identified negative effects in terms of certain issues, with a view to stimulating the Council to revisit aspects of the plan.</p> <p>At the current time, whilst the appraisal identifies how the plan might potentially 'go further' in some respects, no specific recommendations are made.</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Chapters 5 and 6 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options.</p> <p>Also, Chapter 8 explains the Council's 'reasons for selecting the preferred option' (in-light of alternatives appraisal).</p> <p>Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.</p>
<p>i) description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Chapter 13 presents measures envisaged concerning monitoring.</p>
<p>j) a non-technical summary of the information provided under the above headings</p>	<p>The NTS is a separate document.</p>
<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>An Interim SA Report, which essentially presented the information required of the SA Report, was published for consultation alongside the 'Preferred and Alternative Options' consultation document in 2015, under Regulation 18 of the Local Planning Regulations. At the current time, the SA Report is published alongside the Proposed Submission Plan, under Regulation 19, so that representations might be made ahead of submission.</p>
<p>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>The Council has taken into account the Interim SA Report (2015), alongside consultation responses received, when finalising the plan for publication. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan's soundness, and the need for any modifications).</p>

APPENDIX II - HOUSING POLICY ALTERNATIVES

Introduction

Chapter 7 presents summary appraisal findings in relation to the housing policy alternatives (i.e. alternative approaches to reviewing Policy SP2: Housing) that were the focus of appraisal in the build-up to finalising the ‘Preferred and Alternatives Options’ consultation document, and are the focus of consultation at the current time.


The aim of this appendix is to present detailed appraisal findings.

Appraisal methodology

Methodology is discussed in detail in Chapter 7. Essentially, for each of the sustainable topics established through Scoping (see Chapter 4), the alternatives are ranked in order of preference (1 being the highest preference) and efforts are also made to categorise performance in terms of ‘significant effects’ (using **red** and **green** shading). Also, ‘=’ is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them); and ‘-’ is used to denote instances where the objective in question is not applicable.

Appraisal findings

(1) London Plan target (1,435 dpa) delivered at the preferred urban sites			
(2) Higher growth (2,162 dpa), with approximately 1,435 dpa delivered at preferred urban sites and the residual need at preferred greenfield sites			
Topic	Discussion of significant effects ... and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
Economic development & employment	<p>A key priority is the need to support opportunities for redevelopment and renewal in the Croydon Town Centre opportunity area. There is also a need to support the Enterprise Centres (Croydon Metropolitan Centre, Purley District Centre, Crystal Palace District Centre and South Norwood, as designated through adopted Policy SP3); and also support access to employment in Selhurst and South Norwood (where the numbers of job seekers allowance claimants are the highest in Croydon) and New Addington (where there are issues of multiple deprivation). There is also a need to contribute to the achievement of objectives for the Wandle Valley regional co-ordination corridor (through south London and outwards towards Gatwick), the Brighton to London corridor and the economy of London as a whole.</p> <p>Option 1 would involve delivering the London Plan housing target through development of urban sites, with a clear focus on Croydon Town Centre as well as a focus on District Centres, Local Centres and sustainable growth of the suburbs. Notably, analysis of the emerging preferred sites shows that there is also set to be a focus on development adjacent or close to the strategic employment locations to the west of the Town Centre at Waddon and Broad Green and Selhurst; and that approaches to District Centre redevelopment vary with significant redevelopment at Crystal Palace, Purley and Addington District Centres and more limited redevelopment at Coulsdon District Centre as well as the other District Centres in the north of the borough (including South Norwood, where there are issues of employment deprivation). It is likely that this strategy will lead to significant positive effects.</p> <p>Option 2 would involve delivering roughly the same urban sites, as well as a number of greenfield (Green Belt and Metropolitan Open Land) sites primarily in the south and east of the borough. The</p>	2	★1

Topic	Discussion of significant effects ... and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
	<p>only potential draw-back to this strategy relates to traffic generation, as there is the potential for development at locations in the south and east with low public transport accessibility (PTAL) to result in a high incidence of car travel and resulting congestion (for example, along the A23 Purley Way which is an important location for employment and retail where there are existing problems); however, in the absence of traffic modelling data it is not clear that the scale of additional growth (372 dpa) will lead to significant problems. As such, it is fair to assume that Option 2 will similarly lead to significant positive effects.</p> <p>Option 2 is preferable to Option 1 on the basis that: an analysis of the emerging preferred sites shows a likely focus on a small number of relatively large schemes that might, in some cases, include an element of employment land (including perhaps in the vicinity of New Addington); there is likely to be a focus on schemes in Coulson (a well-connected location that is otherwise not set to be a focus of growth); and there is likely to be a focus on the south-east of the borough (Selsdon and Addington) where analysis shows there to be a strong tendency for residents to work in Croydon Town Centre (reflecting the relatively poor transport connections to Central London).</p>		
Transport	<p>A priority issue is the need to direct growth and intensification to areas of high PTAL, particularly Croydon Town Centre but also South Norwood and Upper Norwood/Crystal Palace District Centres (which both have very good PTAL) and other locations / centres with train or tram stops. Growth at these locations will enable employment opportunities and higher order services/facilities to be reached by walking, cycling or public transport. Also, growth at other District Centres (e.g. Addiscombe, Coulsdon, Norbury, Purley, Seldon) is to be supported, on the basis that there will be good potential to access lower order, day to day services/facilities by walking, cycling or public transport.</p> <p>Option 1 would involve delivering the London Plan housing target through development of urban sites, with a clear focus on Croydon Town Centre as well as a focus on District Centres, Local Centres and sustainable growth of the suburbs; and on this basis it clearly performs well and will lead to significant positive effects. Analysis of the emerging preferred sites shows that there is also set to be a focus on development along transport routes where there is relatively good PTAL, although there is also set to be growth around the strategic employment locations at Broad Green and Selhurst, where PTAL is relatively poor.</p> <p>Option 2 would involve delivering roughly the same urban sites, as well as a number of greenfield sites primarily in the south and east. The greenfield locations that would come forward under this scenario are highly likely to have poor PTAL, leading to car dependency (although many trips will be to Croydon or Bromley town centres, which are not overly far at more or less 5km). An analysis of the emerging preferred sites also shows that they tend to be some distance from district / local centres (although one site is within easy walking distance of Coulson, and a cluster of sites is near to Sanderstead). Larger schemes will enable delivery of community infrastructure, and potentially even minor enhancements to public transport, but not necessarily to any</p>	 1	 2

Topic	Discussion of significant effects ... and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
	significant extent. On balance, whilst there will be the potential to implement mitigation, significant negative effects are predicted.		
Energy consumption	<p>Recognising that car dependency / distance travelled by car is discussed in the row above, the focus here is on the potential to support reduced per capita carbon emissions from the built environment, i.e. through supporting delivery of renewable or low carbon energy technologies and also energy efficiency through sustainable design and construction measures. Adopted policy SP6 currently requires district energy networks where opportunities exist due to high heat density²⁰ or an increase in heat density brought about by new development.</p> <p>Option 1 will deliver very significant redevelopment within Croydon Town Centre, and hence there will be the opportunity to coordinate individual schemes so that new buildings are connected to a district heating network fed by a combined heat and power station. Development outside of Croydon Town Centre, under Option 1, is not set to be highly clustered, nor are there set to be any individual schemes of notable size; however, there may be some opportunities.</p> <p>Option 2 would involve a number of strategic scale greenfield development schemes (in addition to the urban sites that would be delivered under Option 1), and hence there would be good potential for delivery of low carbon energy infrastructure, and potentially also development to a high standard of 'sustainable design and construction' (i.e. standards that go beyond Part L of Building Regulations), to become viable. The London Plan encourages 'major developments' to deliver on site of low and zero carbon technologies, in-line with the target of generating 25% of the heat and power from decentralised energy systems by 2025; and adopted Policy SP6 requires major development to be "enabled for district energy connection²¹ unless demonstrated not to be feasible or financially viable to do so." There will be the potential to reduce per capita built environment carbon emissions; however, significant effects are not predicted.</p>	2	★1
Biodiversity, flora and fauna	<p>Croydon contains many sites of biodiversity value from Sites of Nature Conservation Importance (SNCl) which are of local importance to Sites of Special Scientific Interest (SSSIs) which are of national importance. The borough also contains four Local Nature Reserves and one Regionally Important Geological site. Furthermore, biodiversity is associated with the borough's network of gardens and other small green spaces. The Borough Character Appraisal shows that 35% of the borough is taken-up by residential garden space (and only 9% taken-up by buildings), and it is understood that poorly planned piecemeal development of garden land in the past has adversely impacted on local biodiversity (amongst other things). In this context it can be seen why the Council might choose to look to greenfield sites, rather than the urban area, to deliver a high growth strategy (i.e. Option 2).</p>	★1	2

²⁰ 55 residential units or 1,000 m² commercial development per hectare

²¹ Enablement for district energy connection incorporates provision of a communal heating system operating to defined temperatures with a suitable on site space for associated heat connection plant and pipe connection to the perimeter of the site.

Topic	Discussion of significant effects ... and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
	<p>Nonetheless, it is clearly the case that a higher growth strategy with additional loss of greenfield land (Option 2) is less preferable to a lower growth strategy with minimal loss of greenfield land (Option 1). An examination of the emerging preferred Green Belt sites shows that the majority border a locally designated SNCI and, in the far south of the borough, one intersects with a SNCI (to a relatively small extent) and another site (albeit small) is adjacent to Farthing Downs and Happy Valley SSSI. On this basis, it is possible to conclude that Option 2 would lead to significant negative effects. Whilst it is recognised that larger schemes delivered under Option 2 would have some potential to 'design-in' green infrastructure, and that in major developments productive landscapes (allotments and community gardens & growing spaces) can be managed by a school, community group or residents' associations, it is not clear to what extent <i>major</i> developments would come forward under Option 2.</p>		
Water use	<p>It is not necessarily the case that a higher growth scenario (Option 2) would lead to problems in terms of placing additional strain on already stretched water resources. This is on the basis that Croydon is not thought to be any more 'water stressed' than other locations in London or the South East, and it is fair to assume that if housing need is not met in Croydon then it will have to be met elsewhere in the region.</p> <p>With regards to water efficiency, it might be suggested that Option 2 is preferable on the basis that larger schemes may be able to viably achieve higher standards of sustainable design and construction; however, there is no certainty in this respect.</p>	-	
Drainage, flooding and water quality	<p>The Strategic Flood Risk Assessment for Croydon, Sutton, Merton and Wandsworth (SFRA, 2015) identifies the main risks of fluvial flooding in the vicinity of the Norbury Brook through Thornton Heath and Norbury and through Kenley, Purley and Waddon along the Brighton Road and Godstone Road valleys and around the culverted River Wandle. Also, Croydon has been ranked the 4th settlement in England most susceptible to surface water flooding; and there are areas in the borough where groundwater flooding may occur.</p> <p>On the basis that the historic pattern of development in the borough followed the river valleys, none of the greenfield site options that might possibly come forward under Option 2 are affected by fluvial flooding. Furthermore, it is fair to assume that greenfield development would enable high quality Sustainable Drainage Systems (SuDS) to be implemented (integrated as part of a green infrastructure strategy) ensuring that greenfield surface water runoff rates are maintained.</p> <p>On this basis, the two alternatives perform equally.</p> <p>Finally the question is whether the development that would occur within the urban area under both options would lead to significant negative effects. A number of the emerging preferred site options intersect significantly with areas of fluvial flood risk, and data for surface water flood risk is unavailable. It is recognised that flood risk can be mitigated to a large extent through design measures - most notably by ensuring that residential uses are not located on</p>	=	

Topic	Discussion of significant effects ... and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
	the ground floor - but it is nonetheless appropriate to apply the precautionary principle at this stage, and conclude the potential for significant negative effects.		
Air quality	<p>The implications of the alternatives in terms of car dependency / distance travelled by car are discussed above, under the 'Transport' heading. It is difficult to be certain to what extent increased car travel under Option 2 would lead to traffic congestion, and hence worsened air quality; however, as the whole borough is designated as an Air Quality Management Area (AQMA) it is appropriate to conclude that there is the likelihood of significant negative effects.</p> <p>The conclusion reached under the Transport heading for Option 1 was that there is the likelihood of significant positive effects on the baseline'; however, it is less clear that significant positive effects can be concluded for air quality. Even if per capita transport related air pollution emissions decrease, the fact that Option 1 supports a major increase in population within the urban area could mean that air pollution worsens at hotspot locations.</p>	★ 1	2
Waste	The alternatives do not have a bearing on the potential for good waste management.	-	
Noise	Whilst a higher growth strategy could potentially have implications for noise pollution (in particular noise from construction) if it were to involve an increased focus on growth in the urban area, under Option 2 additional growth would be at greenfield sites where noise pollution would be less of an issue. On this basis, it is appropriate to conclude that the alternatives perform roughly on a par.	=	
Materials	As discussed above, high standards of sustainable design and construction might potentially be supported through Option 2 given that there would be an increased number of large schemes; however, this is highly uncertain.	-	
Human health and wellbeing	<p>It is fair to assume that Option 1 will support regeneration, and in this way support health and well-being objectives.</p> <p>It is not clear that the greenfield sites that would be lost under Option 2 would tend to be sites that are currently well used for recreational purposes, or otherwise contribute to health and well-being. However, this is a possibility.</p> <p>In other respects, Option 2 might be seen to have merit from a health and wellbeing perspective, as larger schemes can be designed with health objectives in mind, e.g. integrating green infrastructure and good walking/cycling infrastructure.</p> <p>On balance, it is not possible to differentiate the alternatives. Either have the potential to support the achievement of health objectives, but it is not clear that significant benefits would result.</p>	=	
Crime and Safety	<p>It is fair to assume that Option 1 will support regeneration, and in this way support health and well-being objectives.</p> <p>It is not clear that additional greenfield development (Option 2) would have notable implications, and so it is appropriate to conclude that the alternatives perform on a par.</p> <p>Either have the potential to support the achievement of health</p>	=	

Topic	Discussion of significant effects ... and relative merits in more general terms	Categorisation / Rank of preference	
		Opt 1	Opt 2
	objectives, but it is not clear that significant benefits would result.		
Social inclusion and equality	<p>It is fair to assume that Option 1 will support regeneration, and in this way support social inclusion and equality objectives.</p> <p>The additional growth under Option 2 might be seen to have merit as larger schemes can be designed with social inclusion and equality objectives in mind, e.g. integrating green infrastructure and good walking/cycling infrastructure. It is also noted that some additional growth would likely be directed to the edge of New Addington, a location where there is a need to support regeneration.</p> <p>Whilst significant positive effects are predicted for both options, Option 2 is preferable.</p>	2	★ 1
Housing	<p>The SHMA indicates that neither option will involve meeting objectively assessed housing needs in full (hence significant negative effects are predicted); however, Option 2 would contribute towards meeting needs more fully. It is also important to consider that Option 2 would facilitate delivery of family sized homes, of which there is a considerable undersupply currently.</p>	2	★ 1
Archaeological heritage	<p>The alternatives do not have a bearing on archaeological heritage objectives, given that sufficient measures can be taken to ensure assets are conserved/recorded etc at the development management stage.</p>		-
Education, skills and training	<p>Additional large schemes under Option 2 might facilitate delivery of new schools; however, this is uncertain. Equally, focusing growth at certain locations in the south of the borough might stretch existing school capacity, but this is also uncertain. At this stage it is not possible to differentiate between the alternatives, nor is it clear that either option will in itself lead to significant effects.</p>		=
Culture, Sport & Recreation	<p>As above, additional large schemes under Option 2 might facilitate delivery of new facilities; however, this is uncertain. Equally, focusing growth at certain locations in the south of the borough might stretch existing capacity, but this is also uncertain. At this stage it is not possible to differentiate between the alternatives, nor is it clear that either option will in itself lead to significant effects.</p>		=

Summary

The alternatives appraisal highlights that whilst Option 2 (higher growth with Green Belt release) has merit in terms of socio-economic objectives, more notable are the relative disbenefits of this option in terms of transport/traffic and natural environment objectives. This conclusion is reached taking some account of Green Belt sites that would likely be released, hence the Council might wish to investigate other higher growth options, e.g. options that would concentrate growth to a greater extent and/or ensure a clear focus on the least sensitive areas. However, at the current time it is fair to conclude that Option 1 is favourable.